Matter 1 – Procedural/ Legal Requirements

“Issue: Whether all Statutory and Regulatory requirements have been met?”

Statement Prepared by:

Turnberry

On behalf of:

Grainger PLC

Word Count: 1,524
This Statement has been prepared by Turnberry on behalf of Grainger PLC (Grainger), in advance of the Examination in Public (EiP) of Suffolk Coastal District Council’s (SCDC) Local Plan Review (the Plan). This Statement responds to Matter 1 – Procedural/ Legal Requirements.

Background

2. We have responded to each stage of consultation on the emerging Local Plan and have been consistent in our point that more land for housing serving the wider Ipswich Area must be found. In that respect we have promoted land at Kesgrave, east of Bell Lane and south of Long Strops, known as Alternative Site 520. Full details of our Vision for the site, a mixed use community that is seeking to develop additional facilities and infrastructure for Kesgrave, are fully detailed in Appendix 1 of this Statement. This includes placing the existing Suffolk Aviation Heritage Group Museum on a sustainable path as part of a new community hub at the heart of the development.

3. The north western part of the site is under Option to Persimmon Homes and has been subject to a planning application for 300 dwellings. The application was the subject of an appeal (APP/J3530/W/16/3160194 – Appendix 2) which concluded that the site is a highly sustainable location for development (para 100) but was rejected on grounds of being contrary to the adopted Local Plan.

4. The allocation of Alternative Site 520 would sustainably contribute to the housing needs of Ipswich whilst the transformation of the Museum would leave a lasting and meaningful legacy for Kesgrave and the wider community in accordance with the Vision of the Local Plan.

Response to Main Matter 1 Questions

Duty to Cooperate
1.1 Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the Planning and Compulsory Purchase Act 2004, as amended [the 2004 Act]?

5. The neighbouring authority of Ipswich Borough Council has seen significant under delivery against its annual housing target of 489 homes since 2011, whereby it has delivered an average of 306 homes per year between 2011/12 and 2016/17. This equates to just 63% of its target so far, and despite a significant increase in delivery planned from 2019/20 onwards, the Council is predicted to under deliver against its overall target by the end of the Plan period. The Borough’s most recent Authority Monitoring Report (AMR) (March 2018), which covers the period 2016/17, shows that the Council cannot demonstrate a five year housing land supply, and that it cannot meet its adopted housing target. Until Ipswich Borough Council can advance its evidence base, there will be uncertainty surrounding its ability to achieve the right mix of lower density housing within the urban boundary which is deliverable.

6. The draft Plan cannot comply with the Duty to Cooperate if it does not properly allow for the dialogue between Ipswich’s housing need and its ramifications for the East of Ipswich area to be ‘ongoing’. In order for the draft plan to fulfil the legal requirements under Duty to Cooperate, the Review alluded to in Policy SCLP2.1 should be explicit and time limited to coincide with the emergence of the Ipswich Local Plan.

Sustainability Appraisal

1.2 Is the Sustainability Appraisal (SA) adequate?

1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?
7. The SA is inadequate in its assessment of alternatives. It is a SA in name, but its substantial bulk conceals a lack of rigour in appraising alternatives, particularly in determining the transport sustainability of alternative options.

8. The SA does not refer to the key findings of the various Transport reports that make up the Evidence Base (Documents D29-33) and indeed, the Interim Sustainability Appraisal (B6) predates the earliest Report examining the strategic impact of the preferred strategy upon the network. The final SA (December 2018) predates the final WSP Transport Reports issued in January 2019.

9. The evidence provided by Highways England and the County Council Highway Authority have cited major issues with the capacity of the A12 and A14 and we refer you to our Main Matter 2A and C Statements in this respect. These issues have not been presented and assessed within the SA and alternative spatial strategies that are less reliant on the A12 and A14 corridors have not been assessed.

10. Only the SA can consider the broader implications of the transport strategy on wider environmental issues, including Air, Health and Wellbeing and Economy. However, transport impacts have become separated from the SA and it is not possible for the Council to demonstrate that its spatial strategy and the transport implications of that strategy have been subject to a Sustainability Appraisal.

11. Even if the two documents spoke to one another, we would point out that the WSP Reports have not assessed the other growth scenarios set out in the 2017 consultation. The Council has simply selected its preferred option without properly assessing their sustainability merits. There is no evidenced link between the presentation of the growth options and the eventual selection of the Preferred Option.

12. The Inspector must conclude that on the basis of the SA presented, the Plan cannot pass the legal test.
1.4 Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

13. The SA has not compared an option of growth located in close proximity to Ipswich alongside the use of strategic development funding which could deliver both sustainable patterns of development and funding for A12/A14 upgrades.

14. We note that the WSP transport modelling only assessed the Preferred Option and therefore even if the SA had taken this work in to account, the evidence associated with alternative scenarios would still be lacking. The SA therefore needs to look seriously at alternative growth options East of Ipswich.

15. Land East of Bell Lane & South of Kesgrave (referred to as Site 520 in the Council’s evidence base), offers one such sustainable alternative location for growth to serve Ipswich’s unmet need. The site is noted in the Council’s Strategic Environmental Assessment (SEA) as being within walking distance of regular bus services and cycling infrastructure, which connect it to Ipswich town centre. This accords with paragraph 104 of the NPPF, which states that policies should support development which minimises the number and length of journeys needed for employment, shopping, leisure, education, and other activities.

16. A Vision for the site has been set out in our earlier representation (Appendix 1) and comprises up to 1,300 homes supported by community, social, and green infrastructure. The site will deliver a sustainable new neighbourhood, well integrated with Kesgrave, with a design which supports a public and active transport network, provides commercial units, offices and workshops to support local businesses, delivers on-site community and social facilities to address existing capacity constraints and additional pressure arising from new development, and provides a significant level of green infrastructure. In line with the Strategy in Policy SCLP12.18 which supports the provision of community infrastructure and a diverse mix of uses, Site 520 offers the
potential for a restored Listening Station at the heart of a new civic space with an enhanced Suffolk Aviation Museum.

17. The site has excellent access to shops, services, and facilities and high level of integration with Ipswich, the key economic driver in the region, is essential to the sustainable growth of Suffolk Coastal District and offers a more realistic option for future housing growth which supports Ipswich’s role as the economic heart of the region. Site 520 benefits from connections on all four sides and is already well served by public transport passing through Kesgrave. It is evident that South Saxmundham Garden Neighbourhood and other more rural strategic allocations, do not constitute sustainable development as they will inevitably lead to a rise in private car use due to a lack of integration with existing large settlements and lack of access to services. As stated above, there is a role for these sites to play in supporting growth within the District, however a greater proportion of new housing must be delivered in the East of Ipswich area where it is most needed.

18. A smaller portion of the site has been subject to a recent appeal decision (APP/J3530/W/16/3160194 – Appendix 2) as it is under Option to Persimmon Homes. The appeal concluded that the site is a highly sustainable location for development (para 100) but was rejected on grounds of being contrary to the adopted Local Plan. However, this sub-parcel remains a highly deliverable proposition within the East of Ipswich area.

19. The East of Ipswich area is ideal in that it is already well served by public transport and has radial connections directly in to the City. Investment in public transport provision in this area, both in terms of infrastructure and travel planning will lead to a more sustainable pattern of development rather than promoting large scale
development in more distant centres. This Option deserves thorough and up-to-date assessment within the SA.
Appendix 1 – Representation to Issues and Options for the Suffolk Coastal District Local Plan Review – Land East of Bell Lane and South of Kesgrave, Site 520
Representation on behalf of Grainger

Issues and Options for the Suffolk Coastal Local Plan Review

Land East of Bell Lane and South of Kesgrave – Site 520

October 2017
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Appendix A – Report on Objectively Assessed Housing Need
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Appendix C – Landscape Assessment
Appendix D – Heritage Assessment
Appendix E – Ecology Assessment
Appendix F – Appeal Decision APP/J3530/W/16/3160194
1.0 Executive summary

1.1. Grainger plc is pleased to present its representation to the Issues and Options Stage of the Joint Local Plan Review for Suffolk Coastal District Council and Ipswich Borough Council.

1.2. Demographic trends, most notably the outmigration of younger workers, have left Suffolk Coastal with a top-heavy population profile dominated by older working-age and retired residents, which does not match Suffolk Coastal’s clear aspirations for economic growth. The housing requirements in the Local Plan Review must, therefore, address the imbalance in the population profile and support economic growth. The Council must, therefore, plan, for the high growth scenario set out in the Local Plan Review, necessitating an uplift in the housing requirement from that set out in the Strategic Housing Market Assessment to ensure all employment and housing needs are met and are located in sustainable locations. Growth should be located particularly where economic growth is likely to be targeted, primarily Ipswich and those communities to the East of Ipswich.

1.3. Historically, Ipswich has faced difficulties in adopting a higher density approach, as evidenced in the ‘Winerack’ development. Whilst this approach should form one element of the spatial distribution of growth, given viability realities around the housing market in Ipswich it cannot form the sole approach to accommodating growth within Ipswich and its Housing Market Area. Furthermore, an approach that seeks to reallocate employment land or open space for residential development is not a viable means of addressing growth in the long-term, as this will affect the future economic viability of the town and also affect quality of life of existing and future residents. More importantly, the lower land values prevalent in the City are unlikely to support investment and delivery in infrastructure. Ipswich must, therefore, look to meet a significant proportion of its housing needs outside the Borough boundary, within close proximity to the town.

1.4. To assist Suffolk Coastal District Council in providing for Ipswich and Suffolk Coastal’s long-term housing needs in a sustainable and deliverable location in close proximity to Ipswich, Martlesham Heath and Adastral Park, Grainger has a vision for a sustainable new neighbourhood at land located to the south of Kesgrave, identified as Site 520 in the Local Plan Review consultation document.

1.5. To inform our response to the Issues and Options consultation, a high-level development framework has been prepared to help understand the capacity of the site and the land needed to support the delivery of new infrastructure. This is not a final masterplan: that will only be arrived at after careful consultation with the community; the framework is just a high level spatial exercise to test the capacity of the site and demonstrate what could be achieved through good design and sustainable planning principles.

1.6. The recent decision in respect of the smaller development in the north east corner of the site has informed the development of the framework for the Site. The appeal considered very specific points and dealt with an entirely different proposition for development. Strategic planning as opposed to specific applications for small units of housing, will need to consider all sites and many will raise similar issues to those raised in the appeal. The key difference is that a strategic spatial exercise is an opportunity to provide a greater quantum of sustainable features and infrastructure. The appeal decision has informed in detail what the larger site can deliver for Kesgrave and the wider East Ipswich area. The proposed framework, explained in the next chapter, encompasses the three pillars of sustainability: economic, environmental and social.

1.7. The framework comprises a new neighbourhood to the immediate south of Kesgrave which will provide around 1,300 homes supported by community, social and green infrastructure. There are five key principles which underpin the design of the site:

1. A connected street network that supports a public and active transport network;

2. The provision of commercial units, offices and workshops to support local businesses;

3. On-site community and social facilities to address existing capacity constraints and additional pressure arising from new development;
4. The potential for a restored Listening Station at the heart of a new civic space with an enhanced Aviation Museum, and

5. The provision of a significant level of green infrastructure, to divert pressure from the SPA and to enhance connectivity for existing residents to woodlands and the Mill River to the south.

1.8. Together, these principles, and the design response to them, result in a neighbourhood which achieves the three concepts of sustainability as set out in the National Planning Policy Framework (NPPF): economic, social and environmental. The site is therefore considered to be one that is suitable for allocation as part of the Local Plan Review for a new mixed-use community of around 1,300 homes, employment opportunities, a new primary school, a GP surgery and the potential for a restored Listening Station at the heart of a civic space or parkland setting with community facilities that could work alongside an enhanced Suffolk Aviation Heritage Museum.

1.9. The site presents an excellent opportunity for Suffolk Coastal to contribute to the District’s and Ipswich’s housing needs in a sustainable location that is in close proximity to Ipswich and to the growth areas of Martlesham Heath and Adastral Park, which will provide additional infrastructure this site can contribute towards. The site further benefits from being able to tie into and enhance existing community infrastructure and services located in Kesgrave. The site is environmentally unconstrained with limited infrastructure requirements and therefore presents an opportunity for Suffolk Coastal to complement its larger, strategic sites with a more readily deliverable scheme.

1.10. The scope and timing of infrastructure and services which are proposed for the site will be driven by conversations with key stakeholders and infrastructure providers, and we look forward to working with these bodies. Preliminary discussions have taken place with a number of relevant stakeholders, but as a next stage, we intend to consult the following:

- Kesgrave Neighbourhood Plan Forum;
- Kesgrave Town Council;
- Residents of Kesgrave;
- Suffolk County Council on education and transport;
- Ipswich Buses and other public transport operators;
- The NHS and GPs’ surgeries in Kesgrave; and,
- Suffolk Aviation Heritage Group.

1.11. As part of a broader conversation for the East of Ipswich area, Grainger would be happy to take part in further discussions with the Council and other relevant stakeholders on forthcoming housing proposals, and the locations, timings and scale of these.

1.12. We contend that this site can form a sustainable extension to Kesgrave in support of the Council’s wider objectives, complementing and reinforcing existing community facilities, employment and green infrastructure, whilst resolving the future of the former Listening Station and Museum.
2.0 Introduction

2.1 This representation has been prepared on behalf of Grainger in response to the Issues and Options paper (version 2), which was published by Suffolk Coast District Council on 18th August 2017. The Issues and Options paper is one of the initial steps in Suffolk Coastal Council’s Local Plan Review. The paper has been published in two parts, the first being a joint review with Ipswich Borough Council to identify a strategic approach to resolve cross boundary issues between the two local authorities. The second, part has been prepared by Suffolk Coastal Council and specifically focuses on local growth issues.

2.2 Grainger welcomes the opportunity to comment on the Council’s Issues and Options paper, in particular, with regard to Site 520. Principally, this representation concerns a proposal of a mixed-use development over Site 520. The proposal includes approximately 1,300 dwellings, mixed use areas, green corridors, a primary school over 2.5ha, a GP surgery and a retained and enhanced aviation museum at the centre of a new town park.

2.3 This representation presents an opportunity for a logical extension of Kesgrave, which will connect to Ipswich town centre via Foxhall Road. The proposed neighbourhood will offer additional community facilities, employment opportunities and commercial uses, that will not only complement the existing Kesgrave neighbourhood, but also be seen as an individual destination in its own right with the restored and enhanced Suffolk Aviation Heritage Museum providing a focal point for the area.

2.4 This representation aims to assist Suffolk Coastal Council in achieving its housing provision targets, by demonstrating the suitability of Site 520 for allocation. Overall, the site is capable of providing around 1,300 dwellings that will assist the council in addressing its Objectively Assessed Housing Needs (OAN); community facilities that will service the development and surrounding areas; green infrastructure that will provide residents with opportunities for informal recreation; additional employment opportunities; and, vehicular, pedestrian, cycle and public transport connections to the wider community.

2.5 A fundamental shortcoming of the Joint Local Plan Review consultation is that it is not underpinned by an evidence base: there is no Sustainability Appraisal (SA) of any of the sites which are put forward for development within the consultation document. There is, therefore, little information that the Council can use to assess the sustainability and suitability of the sites.

2.6 To this end, a series of environmental assessments have been undertaken to inform the framework and the response to the Issues and Options consultation. These assessments clearly demonstrate that the site has the environmental capacity to accommodate development in a way that encompasses the three dimensions of sustainable development, as set out in Paragraph 7 of the National Planning Policy Framework: economic, social and environmental. The following environmental assessments have been undertaken and form appendices to this document:

- Transport
- Heritage
- Landscape
- Ecology

Site and Context

2.7 Site 502 ‘Land East of Bell Lane and South of Kesgrave’, henceforth referred to as ‘the Site’, is located to the south of Kesgrave, bound by Foxhall Road running along its southern boundary, Bell Lane to the west and Long Strops Bridleway to the north. The site currently accommodates the Suffolk Aviation Heritage Museum in the south-west, which consists of a RAF Wireless Transmitter (WT) Building and a US Autovon switching station. The buildings are not listed and are not considered to be of listable quality, based on an assessment of criteria set out by Historic England. This point will be discussed further in Section 4.3 of this document and is further detailed in the appended Heritage Assessment. The remaining area of the site is largely vacant agricultural land with a strip of dense plantation woodland (approximately 20m in width) traversing the site to the north.
2.8. The site exhibits a generally flat topography, with a slight downward slope to the south-west towards the junction of Bell Lane and Foxhall Road. Wider views of the site are heavily constrained by surrounding vegetation and the topography of the wider area; an immediate view of the site is obtained on the approach from Ipswich along Foxhall Road.

2.9. Suburban neighbourhoods, being Kesgrave, Martlesham Heath and Rushmere St Andrew to the north, east and west respectively, surround the site. Further to the east is Ipswich town centre, which is approximately 7.1km from the site and 20 minutes by car along Foxhall Road. The area of Foxhall is located south of the site, which is predominantly open agricultural land.

2.10. Facilities of note within close proximity to the site are Foxhall Stadium, a motor sports race track located along Foxhall Road to the west; Cedarwood Primary School to the north; Birches Medical Centre to the north; Kesgrave High school further north, Martlesham Heath Surgery to the east. A plan demonstrating the wide range of facilities available within Kesgrave is shown in figure 2a.

Figure 2a – Kesgrave Services and Facilities

Representation on behalf of Grainger. Issues and Options for the Suffolk Coastal Local Plan Review
2.11. A local bus route (Bus Route 4) runs along the southern boundary of the site on Foxhall Road, which provides connections from Ipswich Central to Falcon Park (see figure 2b) to the east of the site. Additional local bus routes (66 and 63) serve Kesgrave to the north.
3.0 Need and Distribution Analysis

Key Issues faced by Suffolk Coastal and Ipswich Borough

3.1. This section seeks to address the additional need for housing within Suffolk Coastal District, which is driven by the population growth of the District as well as from Ipswich Borough. As outlined in the Issues and Options paper, prepared as part of the Joint Local Plan Review for Ipswich and Suffolk Coast Councils, there are a number of cross boundary issues between the two councils that are sought to be resolved through this review.

3.2. The need for a combined strategic approach between Ipswich Borough Council and Suffolk Coastal Council was highlighted in the Inspector’s Report, which considered the Ipswich Borough Local Plan. Although the inspector found the plan to be sound, the need to continue to comply with the duty to cooperate in relation to neighbouring authorities to ensure housing and employment needs are met was highlighted as a key issue.

3.3. The key strategic issues outlined in Part 1 of the Issues and Options paper are categorised into the three disciplines of sustainability: social, economic and environmental. The strategic issues facing Suffolk Coastal District and Ipswich Borough Councils have been summarised in Table 3.1 below.

Table 3.1 – Strategic Issues Facing Suffolk Coastal and Ipswich Borough Councils

<table>
<thead>
<tr>
<th>Social</th>
<th>Ipswich</th>
<th>Suffolk Coastal</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Population growth of 13,294 between 2014-2036</td>
<td>• Population growth of 8,259 between 2014-2036</td>
<td></td>
</tr>
<tr>
<td>• High number of children aged 0-5 years and higher population of working age people due to availability of jobs</td>
<td>• Pockets of deprivation</td>
<td>• Heavy reliance on private motor vehicles</td>
</tr>
<tr>
<td>• Ageing population with a trend to retire in rural areas</td>
<td>• Young people leaving district</td>
<td>• Lack of public transportation</td>
</tr>
<tr>
<td>• Projections indicate more births than deaths between 2014-2024</td>
<td>• Ageing population</td>
<td>• Air quality management area</td>
</tr>
<tr>
<td>• Limited land available (large areas of protected land)</td>
<td>• Projections indicate more deaths than births between 2014-2024</td>
<td>• Extensive areas of high quality agricultural land</td>
</tr>
<tr>
<td>• House sales decreased by 50% in last two years</td>
<td>• Limited land availability</td>
<td>• Limited availability of previously developed land</td>
</tr>
<tr>
<td>• Lowest house price to income ratio in HMA (6.44 times average income)</td>
<td>• High house prices and high second home ownership (9 times average income)</td>
<td>• Need to increase renewable energy provision</td>
</tr>
<tr>
<td>• Highest affordable housing need</td>
<td>• Increased demand for specialist housing</td>
<td>• Need to ensure appropriate response to sea level rise and eroding coastline</td>
</tr>
<tr>
<td>• More diverse range of housing needed to cater for specialist housing and student accommodation</td>
<td>• Limited access to health provision</td>
<td>• Need to engage sustainable construction techniques and green infrastructure</td>
</tr>
<tr>
<td>• Lowest levels of physical activity in the region</td>
<td>• Long term health problems and disabilities due to ageing population</td>
<td>• Flood risk in low lying areas</td>
</tr>
<tr>
<td>• Highest number of criminal offences</td>
<td>• Distance to primary and secondary schools</td>
<td>• Large number of protected sites across district due to species and habitat value, which come under pressure from increased recreational and tourist activity</td>
</tr>
<tr>
<td>• Insufficient primary and secondary capacity</td>
<td>• New employment opportunities to be accessible by local population</td>
<td>• Significant Areas of Outstanding Natural Beauty and areas of high quality landscape to be protected</td>
</tr>
<tr>
<td>• Lower levels of qualified people</td>
<td></td>
<td>• Need for extension of green infrastructure network</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Environmental</th>
<th>Ipswich</th>
<th>Suffolk Coastal</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Vehicle congestion and air quality issues</td>
<td>• Need to increase renewable energy provision</td>
<td>• Heavy reliance on private motor vehicles</td>
</tr>
<tr>
<td>• Remediation of contaminated sites</td>
<td>• Need to increase renewable energy provision</td>
<td>• Lack of public transportation</td>
</tr>
<tr>
<td>• Need to increase renewable energy provision</td>
<td>• Need to ensure appropriate response to sea level rise and eroding coastline</td>
<td>• Air quality management area</td>
</tr>
<tr>
<td>• Large number of protected sites across district due to species and habitat value, which come under pressure from increased recreational and tourist activity</td>
<td>• Need to engage sustainable construction techniques and green infrastructure</td>
<td>• Extensive areas of high quality agricultural land</td>
</tr>
<tr>
<td>• Numerous protected species and habitats within Borough</td>
<td>• Flood risk in low lying areas</td>
<td>• Limited availability of previously developed land</td>
</tr>
<tr>
<td>• Need for extension of green infrastructure network</td>
<td>• Large number of protected sites across district due to species and habitat value, which come under pressure from increased recreational and tourist activity</td>
<td>• Need to increase renewable energy provision</td>
</tr>
<tr>
<td>• High number of heritage assets</td>
<td>• Significant Areas of Outstanding Natural Beauty and areas of high quality landscape to be protected</td>
<td>• Need for extension of green infrastructure network</td>
</tr>
<tr>
<td>• Some Areas of Outstanding Natural Beauty</td>
<td>• High number of heritage assets</td>
<td>• Flood risk in low lying areas</td>
</tr>
</tbody>
</table>
3.4. As outlined in Section 2 above, this representation seeks to assist Suffolk Coastal Council in achieving its new housing targets that have arisen as a result of the Local Plan Review. Of particular note, this proposal aims to achieve the following and as such, address the key issues identified above:

- Provision of additional developable land;
- Provision of additional housing to accommodate significant population increases between 2014 and 2036;
- Provision of additional green infrastructure;
- Reduction in pressures on protected habitat sites;
- Increase public transport usage through provision of diverted/more efficient bus services;
- Improved access to community facilities such as education and medical services; and,
- Creation of additional employment opportunities within the site to support the growing population.

### Housing and Employment Need

3.5. Part 1 of the Issues and Options paper discusses the Objectively Assessed Housing Need (OAN) for housing within the Ipswich, Babergh, Mid Suffolk and Suffolk Coastal Council area, identified by the Strategic Housing Market Assessment (SHMA). An assessment of Objectively Assessed Housing Need is provided at Appendix A of this document and key findings summarised below.

3.6. The table below details the number of dwellings required within each local council area between 2014 and 2036. It shows that Suffolk Coast in particular, is expected to experience a market uplift of 15% and as such, is required to accommodate an additional 10,111 dwellings within this period, or 460 dwellings per annum (dpa). Ipswich is also expected to experience a market signal uplift of approximately 10% and as such, projected to need an additional 11,420 dwellings between 2014 and 2036, which equates to 519dpa. These figures represent projections similar to those in the current adopted Local Plans for Suffolk Coastal, being for ‘at least 7,900 dwellings’ for the period of 2010-2027 (465dpa), despite an assessment of objective need carried out in 2010 by Oxford Economics revealing a need for 11,000 new homes.
Since the OAN was published in 2014, the following housing projects have been committed to within Ipswich and Suffolk Coastal:

<table>
<thead>
<tr>
<th>Ipswich Borough Council</th>
<th>Suffolk Coastal District Council</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,106 dwellings with planning permission (not started)</td>
<td>2,504 dwellings with planning permission (not started)</td>
</tr>
<tr>
<td>380 dwellings under construction</td>
<td>641 dwellings with planning permission (under construction)</td>
</tr>
<tr>
<td>594 awaiting a Section 106</td>
<td>1,780 dwellings on allocated sites</td>
</tr>
<tr>
<td>4,987 on allocated sites</td>
<td>2,000 dwellings at Adastral Park</td>
</tr>
</tbody>
</table>

Therefore, a shortfall of 1,645 dwellings in Suffolk Coastal and 3,131 dwellings in Ipswich has been identified.

The Government is currently consulting on a new standard method of calculating local authorities’ housing need across the country. Under this revised methodology, the OAN for Suffolk Coastal Council is 4,950 dwellings between the 2016 and 2026 and 4,630 dwellings within the same period for Ipswich Borough. This equates to an additional 442dpa for Ipswich and 495dpa for Suffolk Coastal. Although this represents a reduction in housing for Ipswich, it identifies an increased need within the Suffolk Coastal district. If the revised OAN methodology were used over the same time period used for the Strategic Housing Market Assessment above, the total housing requirement for Suffolk Coastal would be 10,890 dwellings. And the unmet housing need would increase to 2,424 dwellings.

The proposed transitional arrangement set out in the consultation document, Planning For The Right Homes In The Right Places, state that any local plans that are under review should adopt the revised methodology unless the plan will be submitted for examination on or before 31 March 2018. The Suffolk Coastal Local Plan Review website indicates that the plan will be submitted for Examination by the Planning Inspectorate in February 2019. As such, in accordance with the transitional arrangements, the Local Plan Review should reflect the new standardised OAN methodology.

As a direct result of the population growth and increased housing need above, the need for additional employment within Ipswich and Suffolk will also increase exponentially. The Issues and Options paper utilises the East of England Forecasting Method (EEFM, August 2016) to calculate baseline projections for employment. It reveals that Ipswich job market is expected to increase by 25.3% (19,040 jobs) during the period of 2014-3036 and Suffolk Council is expected to increase by 13.1% (7,490) during the same period. An increase in economic participation rates of those aged 65+ is contended by the SHMA to fill a significant proportion of new jobs created. The SHMA has therefore placed significant emphasis on jobs being taken by older residents; however, this approach is considered to be based on significant flaws outlined in section 2 of the OAN assessment. Consequently, there is a risk that future housing requirements could substantially underestimate the number of new homes needed for people who move to the area in the future.

The current OAN endorsed by the SHMA will exacerbate the existing economic and social (demographic) problems in the District and should therefore be disregarded for plan-making purposes for the following reasons:

- The use of short term migration trends as the basis for deriving a baseline demographic projection of housing need;
- The inadequacy of the assessment of past under-delivery of housing in order to establish the extent to which an uplift to the baseline demographic need should be applied; and
- The use of un-justified and unrealistically high activity rates for the over-65 age group in order to balance jobs growth with the demographic baseline.
3.12. The housing requirement in the Local Plan Review should address the imbalance in the population profile and support economic growth, which equates to a figure in excess of locally assessed housing need.

3.13. Part one of Ipswich Borough and Suffolk Coastal Council’s Joint Local Plan Review outlines three distribution scenarios for each Council. The scenarios are outlined in the table below:

<table>
<thead>
<tr>
<th>Council</th>
<th>Growth Scenarios</th>
</tr>
</thead>
</table>
| Ipswich          | 1. Higher-density urban regeneration  
|                  | 2. Increased development beyond the Borough boundary  
|                  | 3. Change the use of existing land in the Borough to housing                      |
| Suffolk Coastal  | 4. Continuation of existing approach in Core Strategy  
|                  | 5. Focus on Ipswich and A14 transport corridor  
|                  | 6. A12 transport corridor and dispersed rural focus                               |

The growth three scenarios for Suffolk Coastal are represented in the following figure, which has been extracted from the Issues and Options document.

3.14. A full appraisal of the number of homes and hobs that should be planned for is set out in Section 4 of the OAN report and summarised here. If the economic growth objectives are to be achieved across the HMA and in Suffolk Coastal District, policy should be aspirational and create an environment which encourages the creation of new jobs aligned with the delivery of additional market and affordable homes beyond what has historically been planned for.

3.15. Growth in households and jobs from Scenario A is expected to be disproportionately driven by those over the age of 65, further compounding the imbalance of older people to younger people in the District. It is clear that this scenario would not align with the ambitions of the sub-regional economic strategy.

3.16. Scenario B advocates a 20% uplift to the OAN of 460 per annum, resulting in an OAN of 552 dwellings per annum and jobs growth of 32,376 (1,472 per annum). This uplift is currently indicative, but the principle is supported to ensure that housing growth in the District does not constrain growth in the labour force.

3.17. Scenario C, is one which is infrastructure delivery-led, seeking a greater uplift to the OAN at 40% to derive a housing requirement of 644 dwellings per annum, but caps the uplift to the trend in jobs growth at 20% as per Scenario B. Scenario
C considers the commitment of the Norfolk and Suffolk Devolution Agreement (June 2016) to substantially increase housing delivery and the delivery of significant infrastructure needed to support the delivery of new homes. This scenario acknowledges that Ipswich and those communities around Ipswich, including those within Suffolk Coastal District, are well placed to benefit from the substantial uplift in targets, whilst increasing the prosperity of the county. It states that an infrastructure-led scenario reflects the opportunity to create a more successful and prosperous area which benefits from improved infrastructure supporting the ambitious uplift in the housing requirement. It also acknowledges that this scenario would help to address affordable housing needs in the District.

3.18. It is considered that Scenario C would best support the economic aspirations of the sub-region and address the key social issues that are currently facing Suffolk Coastal District, including the rebalancing of the population profile, encouraging and allowing younger people to live and work in the area, supported through the greater provision housing near the key employment sources identified. A high growth scenario would also help to deliver the necessary affordable housing. Long-term planning for a higher housing requirement above the baseline OAN would start to favourably shift the balance in the population profile, resulting in an increase in the younger working age population, which is crucial as the sectors expecting to grow in Suffolk Coastal typically have higher proportions of younger workers.

3.19. Historically, Ipswich has faced difficulties in adopting a higher density approach, as evidenced in the ‘Winerack’ development. Whilst this approach should form one element of the spatial distribution of growth, given viability realities around the housing market in Ipswich it cannot form the sole approach to accommodating growth within Ipswich and its Housing Market Area. Furthermore, an approach that seeks to reallocate employment land or open space for residential development is not a viable means of addressing growth in the long-term, as this will affect the future economic viability of the town and also affect quality of life of existing and future residents.

3.20. We therefore contend that Ipswich Borough Council should pursue Growth Scenario 2 and Suffolk Coastal Council should pursue Growth Scenario 5. Regardless of which option is acted upon, a minimum of 27% of the projected housing need will need to be accommodated in the areas east of Ipswich and this should be directed to the most sustainable locations in close proximity to existing services and communities and in close proximity to Ipswich and strategic transport links to the town.
4.0 Site Analysis

4.1. There are a number of environmental and built form factors that relate to the site. This section seeks to appraise the Site (referred to as Site 520 within the Issues and Options Consultation Document) in terms of these environmental and built form factors. The Site is shown at figure 4a below.

Figure 4a – The Site

4.2. The following environmental assessments have been undertaken to inform the development over the site and to shape the design response:

- Transport
- Heritage
- Landscape
- Ecology

4.3. A summary of these assessments is set out below demonstrating how they have informed the development vision for the site, resulting in a development that adheres to the three dimensions of sustainable development (environmental, social and economic) and one that should be taken forward for allocation. The assessments are included in Appendices B-E for reference.
4.4. Each consultant prepared an environmental baseline plan to enhance understanding of the site and to progress an initial site framework. Together, the assessments outlined above have been overlaid in a site analysis plan, shown at figure 4b, in order to inform the preparation of an initial site framework.

4.5. The need to provide a robust evidence base to support the distribution and quantum of growth, and individual site allocations is a fundamental principle of the plan making process, as set out at Paragraph 158 of the NPPF. The studies undertaken so far are robust initial assessments of the site; however, further work will be undertaken to enhance our understanding of the site and its development potential. Notwithstanding the need to ensure the evidence base is as developed and robust as possible, the existing assessments clearly demonstrate that the site has significant environmental capacity to accommodate development of the scope being proposed.

Transport

4.6. At the core of the National Planning Policy Framework (2012) is a presumption in favour of sustainable development, which should be adopted through plan-making and decision-taking. The strategic housing needs of Kesgrave and Suffolk Coastal Council must be met in the most sustainable locations. The Transport Report contained in Appendix B demonstrates the qualities of sustainable strategic development in Kesgrave and the ability to accommodate further growth for the town.

4.7. The transport consultants undertook a desk-based and on-site review of the site. The initial opportunities and constraints plan revealed that there are two Public Rights of Ways (PROWs) traversing the site, one in the south-west corner of the site continuing towards Foxhall Stadium and the other in the north-east corner, terminating within the site. These PROWS have been considered, enhanced and incorporated into the framework proposed.
4.8. Additionally, a public bridleway, referred to as Long Strops, runs along the northern boundary of the site. It is the intention of Grainger that this asset will be protected by any future development of the site.

4.9. The transport report also revealed potential site access locations. Two access points are feasible via Bell Lane: the primary access located at the junction of Bell Lane and Foxhall Road, and a secondary access located to the north. Additional road infrastructure improvements, in the form of a roundabout, will be required at the Foxhall Road and Bell Lane junction to accommodate the proposed access point. This will be secured by S106 contributions. Initial designs for this have been provided in the Transport report included in Appendix B of this document. The secondary access point has received previous approval by Suffolk Coastal Council as the local highway authority in the past for a smaller residential scheme.

4.10. The Traffic Report also proposed a third access point, along the northern boundary of the site. This would link through to Millennium Way then Century Drive and Ropes Drive within the existing town of Kesgrave to the north.

4.11. It was deemed that access via Dobbs Lane was not feasible as the road reserve width is too narrow (approximately 5m). A maintenance point from the northeast-most corner of the site exists and will be utilised for emergency access only. The road hierarchy is demonstrated below at figure 4c.

4.12. There are a number of existing bus routes that services the areas to the east of Ipswich, run by Ipswich Buses. Existing routes surrounding the site are the number 4, which runs from Ipswich Station, through the town centre and along Foxhall Road towards Martlesham Heath; and, the number 66, which runs from Ipswich Town Centre, through to the developed area of Kesgrave.

4.13. In addition to public transport route, a number of cycle and pedestrian routes surround the site. There are various traffic free cycle routes that service the area to the north of the site as well as a National Cycle Route (Route 1), which runs along the east coast of England and Scotland.

Figure 4c – Proposed road hierarchy
Landscape

4.14. A Landscape Assessment was carried out over the site in support of this representation and is contained in Appendix C. Kesgrave and surrounding areas are characterised under the Suffolk Landscape Character Assessment as gently rising land of the ‘Estate Sandlands Landscape Character Type (LCT)’. The LCT is described as, ‘relatively simple landscape comprising extensive areas of conifer plantations, arable land and some remnant heaths, reflecting the underlying sandy soils. Scots Pine shelterbelts and ‘pine lines’ are defining characteristics’.

4.15. As discussed in Section 2 above, the site is generally flat, with its highest natural ground level being located along the northern boundary (approximately 35m AOD) and the lowest point located in the south-west (28m AOD). Although technically defined as ‘open countryside’ for planning purposes, the surrounding land uses and visual character of the site results in a fragmented landscape that does not contribute to a functionally intact agricultural landscape.

4.16. The conclusions of the Landscape Report indicate that the site is relatively unconstrained in terms of views. The points where the site may form a visible portion of the view are limited to the local public footpaths within the site and along the northern boundary, surrounding minor road network (Foxhall Road and Bell Lane) and some residential receptors along the northern boundary. Overall, views of the site are limited to its immediate context.

Heritage

4.17. No statutory designations (Listed Buildings, Conservation areas, Scheduled Ancient Monuments or World Heritage Sites) are located within the boundaries of the Site. Due to its historic use, the Site has been explored in the Heritage Report contained in Appendix D.

4.18. As discussed in Section 2 above, the site contains the Suffolk Aviation Heritage Museum, which comprises an RAF WT Building (possible bomber command WT station) and a US Autocon switching station. The buildings are not listed and are not considered to be of listable quality, based on an assessment of criteria set out by Historic England. The buildings are in a degraded state and as such, remedial works will be required (see Figure 4d). The framework for the site seeks to retain the Suffolk Aviation Heritage Museum and there is an opportunity to provide a broader platform of social, community and commercial units that will drive an increased patronage and appreciation of this asset, helping ensure the Museum is placed on a more sustainable footing for the future. Please refer to the appended Heritage Report, which details the historic relevance of the site and buildings.
Ecology

4.19. An Ecological Appraisal was carried out over the site in April 2017 (included in Appendix E), which formed a critical piece of information for the framework development of the site. The report indicates that the site supports a variety of different habitats, including those that are of relatively limited intrinsic ecological values to those that may qualify as areas of importance.

4.20. A number of designated sites are also present in the vicinity including, Deben Estuary SPA, Ramsar and SSSI (approximately 2.97km east of) and Stour and Orwell Estuaries SPA (approximately 4.51km west of). The Site is considered to be a sufficient distance away from both sites to not cause direct impacts such as noise or pollution; however the indirect impacts such as recreational pressures must be considered. As such, appropriate on-site outdoor recreational facilities must be provided in order to reduce pressures on Deben and Stour Orwell Estuaries.

4.21. A number of 'green spines' are proposed within the framework for the site to provide residents with recreational opportunities as well as accommodate habitats to support various local wildlife species. Although there is no set quantitative amount of green space that must be provided per dwelling, of the 48.45ha of developable area within the Site, 8.7ha is green infrastructure which includes the central 4.2ha park. This equates to 17.95% of the developable area being set aside for green infrastructure and is therefore considered unlikely to give rise to development pressures on either of the SPAs within close proximity to the sites.
5.0 Site History

5.1 An outline planning application was submitted over a smaller portion of the Site (refer to Figure 5a) in November 2015 (SCC Ref DC/15/4672/OUT) by Persimmon Homes Limited and BPT Limited. The scheme proposed was a phased development comprised of 300 dwellings, land for a primary school and associated landscaping and open space. The scheme was refused by Suffolk Coastal Council on 15 July 2016 based on the view that the proposal was, ‘contrary to Policies SP20 and SP29 of the Development Plan, resulting in unacceptable development, which does not accord with the broad policy approach and thus puts greater pressure on services and where the loss of countryside would further erode opportunities, as required by SP20, to build on the provision of open space and network connections’. In summary, the refusal was based on the following grounds:

- The scheme would result in significant impacts on the provision of open space and network connections;
- The site is in a location that is defined as countryside under the Development Plan and outside the physical limits boundary; and,
- The scheme would result in unacceptable pressures on services.

5.2 The applicant lodged an appeal against the Council’s decision on 22 November 2016. The inquiry for the appeal was held on 8-10 August 2017, after which the Planning Inspectorate dismissed the appeal on 16 October 2017 (a copy of the decision is included in Appendix F). The following ‘main issues’ were identified by the Planning Inspectorate:

- Whether the site is in a location which is, or can be made, sustainable;
- Whether the proposal would be harmful for the reasons given in SCC’s refusal (impacts on countryside, impacts on open space and network connections and pressure on services); and,
- The impact of the scheme on the supply of housing.

Figure 5a – The Persimmon appeal site
5.3. Despite both main parties, SCDC and the appellant, agreeing within the Statement of Common Ground that the site was in a sustainable location, the Inspector found that the site was not in a sustainable location. The reasons being that the site is located more than an acceptable maximum walking distance from all local facilities; lack of employment opportunities located on site or within an acceptable walking distance; and insufficient access to bus services.

5.4. The inspector concluded that the development would be contrary to the Local Plan Strategic Policy SP20, which in turn confirms the site lies within an area defined, as countryside and SP29 would be applicable to the development. However, it was found that little to no harm would be a result of the site transitioning from undeveloped to one that is developed. This is owed to the fact that the site does not have any ecological issues, nor is it high value agricultural land. In essence, there would be no significant losses of countryside character if the scheme were to proceed.

5.5. It was also concluded by the Inspector that the proposed scheme would have an acceptable impact on the provision of open space and network connections, the details of which could be resolved through conditions and planning obligations. In addition to this, it was also found that the proposal’s impacts on infrastructure services were acceptable and manageable through CIL contributions for health facilities and the provision of education facilities (primary school). However, it was noted that these aspects were viewed as mitigation techniques rather than enhancements to the site.

5.6. Finally, the Planning Inspectorate assessed the current supply of housing and the Objectively Assessed Need for housing within the Suffolk Coastal Council District. It was found that the Council has fallen behind in delivering its five-year housing target. As such, the provision of an additional 300 homes (100 of which would be affordable housing) was a positive contribution towards the supply of housing.

5.7. The Planning Inspectorate’s decision and review of the proposed scheme has been fundamental to the development of the framework for the Site. The appeal considered very specific points and dealt with an entirely different proposition for development. Strategic planning, as opposed to specific applications for small units of housing, will need to consider all sites and many will raise similar issues to those raised in the appeal. The key difference is that a strategic spatial exercise is an opportunity to provide a greater quantum of sustainable features and infrastructure. The appeal decision has informed in detail what the larger site can deliver for Kesgrave and the wider East Ipswich area. The proposed framework, explained in the next chapter, encompasses the three pillars of sustainability: economic, environmental and social.
6.0 Development Framework

6.1. As stated throughout this representation, it is the intention of Grainger to demonstrate the suitability of the Site and highlight its viability as a future development site. In support of this rationale, a masterplan/framework has been prepared over the site. It is important to note that this framework is an assessment of the site’s capacity and potential; it does not represent a final, fixed masterplan for the Site at Kesgrave. It will be revised and refined through further research over the site and its potential and constraints, and through consultation with key stakeholders including members of the public and Kesgrave Town Council.

6.2. The development vision and site framework have been conceived with regard to Kesgrave and East Ipswich’s historic development patterns and in response to a number of environmental and built form factors, which have been assessed in detail and will continue to be investigated in order to refine the framework.

6.3. The proposed framework offers a logical extension of the existing Kesgrave neighbourhood and utilises existing east-west road corridors that connect Ipswich Town Centre with areas such as Martlesham Heath and Adastral Park. The distinct elements that form the framework of the site are:

- Urban Form
- Community Facilities
- Open Space
- Transport

6.4. The site at Kesgrave will comprise a single neighbourhood that will accommodate approximately 1,300 dwellings. It will form an extension of the existing neighbourhood of Kesgrave, and continue the trend of development to the east of Ipswich between Foxhall Road and the A1214. The proposed framework will complement the existing line of development and form part of the small neighbourhoods that make up the east of Ipswich area, being Kesgrave, Martlesham Heath and the recently approved Adastral Park development.

6.5. With an average density of at least 35 dwellings per hectare, the development will reinforce a traditional settlement pattern of slightly higher densities at its core, clustered around the proposed neighbourhood centre and community/social facilities. The density will then gradually reduce towards the southern boundary to provide a sensitive urban-rural edge.

6.6. The defining features of the proposed development will be corridors of green infrastructure, forming ‘green spines’ traversing the site from north to south and east to west. The development seeks to create areas of urbanised development amongst a series of ‘green spines’, which will provide informal recreational opportunities for residents of the Site and Kesgrave, and ensure the development does not lead to recreational pressures on the SPA by connecting routes down to Mill River as well as East towards Adastral Park and Martlesham.

6.7. The landscape framework within which the development would be located would not only create a strong special definition for settlements themselves but also provide a robust landscape framework for new communities within Suffolk Coastal District.

Community facilities

6.8. The scale and size of development that can be achieved at Kesgrave will not only contribute significantly to the Council’s identified housing needs, but it will also enable the delivery of a range of community and social infrastructure, such as:

- A new primary school;
- New health care facilities
- New retail facilities focused on the mixed-use neighbourhood at the centre of the Site; and,
- A new civic park around the former Listening Station reinforced by small-scale employment space, new community spaces to support an expanded range of services or facilities for Kesgrave, and the potential to revitalise the existing Suffolk Aviation Heritage Museum as part of this offer.

6.9. A new primary school is proposed along the northern boundary of the Site to potentially form
Figure 6a – Development Framework
one administrative unit with the existing school. However, this location is not fixed and the school could be located more centrally within the site. The catchment area for the school will encompass the proposed development, and beyond the Site boundaries. The proposed school will serve demand arising not only from the new neighbourhood, but will help to address capacity issues within Kesgrave and Martlesham.

6.10. Due to the historic interest of the existing RAF buildings, it is proposed to retain the buildings in their original setting and utilise them within a business context. These buildings could accommodate additional employment opportunities for residents of the development whilst still preserving the historical values. The large floor area of the buildings makes them ideal locations to accommodate flexible uses, including potential new Museum facilities. The complex will form a new offering of social, community and commercial uses which will be shaped by local residents, generating increased footfall and ensuring viability of the Museum in the future. This will offer an attraction as well as complimenting the proposed primary school to the north from an educational perspective.

6.11. The current process is an opportunity to enhance and highlight the significance of these buildings and the site. The majority of the buildings are dis-used and in need of substantial repair; the proposed development will provide the opportunity to restore these buildings and bring them back into use. The buildings will be surrounded by a significant open setting to reinforce their sense of separation.

6.12. Additional mixed-use areas are proposed centrally within the site. It is envisaged that these areas will provide retail uses to service the residents of the proposed neighbourhood. In addition to this, a new health centre will be proposed within these areas. The NHS provided comments in respect of the Persimmon development over the site and capacity of existing health care services in 2015. Through this process it was requested that the applicant pay a contribution through CIL to increase the capacities of the existing facilities. This framework can accommodate a health centre within the development site boundaries if that is required, which will result in employment generation and the provision of services within walking distance of majority of the site. The NHS was consulted again prior to the submission of this document and further discussions will be held to understand the extent of capacity issues which will need to be addressed through CIL contributions or through the provision of the GP surgery on the Site.

6.13. The proposed community and social facilities will result in the creation of additional employment within the boundaries of the Site, facilities within an acceptable walking and cycling distance of majority of the proposed dwellings; and community assets that will provide areas for social interaction and wellbeing, all of which promote the three aspects of sustainability.

Open Space

6.14. As described above, it is envisaged that the development of the site will incorporate a series of green corridors, or ‘spines’ throughout the development. A major green corridor will run through the site from east to west; starting at Dobbs Lane, running through the centre of the site to the south of the RAF buildings and out to Bell Lane. The second green corridor will run from north to south and connect through to the existing green corridor within the residential development to the north of the site.

6.15. The intention of these ‘green spines’ is to provide residents and visitors with opportunities for informal recreation. In turn, this will help to mitigate any capacity issues on surrounding open spaces. As discussed in Section 4 above, the site is located within close proximity to two SPAs. As such, appropriate open space must be provided within new developments to reduce indirect impacts on these areas. 17.95% of the developable area within the Site is proposed to be green infrastructure.

6.16. The proposed green corridors will accommodate pedestrian and cycle facilities to provide opportunities for residents of the community to walk and cycle through these connections throughout the site. We will be consulting with key stakeholders, particularly Suffolk Wildlife Trust, to discuss how this network can complement the wider area and work with County Wildlife Sites near by.
Transport Infrastructure

6.17. The focus of the proposed development is to create a neighbourhood that is sustainable. As such, a focus on multi-modal transport connections has been highlighted in the proposed framework. The site promotes not only vehicular transport, but also public transport, cycle routes and pedestrian pathways, thereby creating a shift away from the private vehicle and resulting in a reduction in carbon emissions and improved health/wellbeing of residents of the proposal.

6.18. The first vital transport connection is an additional bus route through the site. Consultation has commenced with Ipswich Buses with regard to accommodating an additional/diverted bus route through the site. At this stage, two options are being explored with Ipswich Buses. The first being a diversion of Bus Route 4, which connects the Ipswich Town Centre with Martlesham Heath. The bus would enter the site via the proposed access point from the intersection of Bell Land and Foxhall Road, continue through the main road within the site, past the RAF buildings, then loop back past the primary school, exit the site onto Bell Lane and continue the journey along Foxhall Road through the Martlesham Heath. The second option would be an addition to Bus Route 66, which services the northern development. It is envisaged that the bus would enter the site at the north-most entrance on Bell Lane, continue through the street, past the primary school and connect to the north via Millennium Way. As mentioned, these options are currently being reviewed by Ipswich Buses to determine the most appropriate route.

6.19. The second transport connections proposed as part of this framework are cycle and pedestrian routes. A number of cycles and pedestrian pathways are envisaged within the Site as demonstrated in the proposed masterplan in Figure 6a. The predominant pedestrian connection has been adapted from the existing PROW within the south-west corner of the site. The new connection will provide a clearer link from the woodland to the west of the site, through the development and up to the north-east corner of the site; connecting to another series of PROWS within northern Kesgrave. An additional pedestrian route is proposed to join up with the PROW that is located within the adjoining site to the south. This connection will provide connections further north to the existing bridleway. These will enhance accessibility to both the woodlands to the south and west of the Site, and the Mill River to the south.

6.20. In addition to pedestrian, cycle and public transport connections, the site is also strategically located within a position that is close to the A12 and A14, which provides connections further north along the eastern coastline, or further inland. Foxhall Road also provides a clear and direct connection from the site to Ipswich Town Centre and areas further east, such as Martlesham Heath and the approved Adastral Park development.

Sustainability

6.22. The inclusion of the above facilities and infrastructure to service the needs of the immediate community demonstrates how the development is underpinned by the three elements of sustainability as outlined in the NPPF: providing economic, social and environmental benefits that will enable Suffolk Coastal Council and Ipswich Borough Council to deliver sustainable patterns of development.

6.23. First and foremost, the Site provides comprehensive sustainable connections within the boundaries of the development Site and to the wider context of Suffolk Coastal and Ipswich. This has been achieved through the aspiration of a modal shift in transport amongst residents. An additional/re-directed bus route will service the Site and provide residents with public transport connections to...
Figure 6b – Bus Routes in Kesgrave
Ipswich Town Centre and neighbourhoods further to the east. The Site will also accommodate a series of pedestrian and cycle connections, which will also link up to the northern bridleway and pedestrian/cycle facilities further north within Kesgrave. The delivery of this infrastructure will provide residents with the opportunity to utilise active transport as a mode of transport within the Site boundaries and immediate area. This achieves an environmental and social benefit to the community; by reducing the number of cars on the local roads as well as providing public spaces that can accommodate a wide range of social activities, and leading to improved health outcomes through active travel.

6.24. The proposed framework offer opportunities for local employment within the Site, achieved through the proposed mixed-use areas at the heart of the Site as well as its associated local employment opportunities. This will not only provide for local employment, with associated reductions in private car use, but will also ensure that the daily services and facilities required by local people can be found on the Site itself.

6.25. The third element, which underpins the Site as a sustainable location is the provision of green infrastructure; represented as the ‘green spines’ within the development Site. These areas will accommodate walking and cycle paths that will provide residents with opportunities for informal and active recreation. In turn, these open spaces will help to alleviate the pressures on existing County Wildlife sites. The key benefits that will be of consequence to the proposed green infrastructure are environmental and social.

6.26. The fourth and final element that creates a site that is sustainable is the provision of community/social facilities within the Site. The proposed framework includes the provision of a primary school and new health services. These will provide a social benefit to the local community by providing access to services within an acceptable walking distance of majority of the Site. This will add to and expand Kesgrave’s offering of community and social facilities, helping to ensure that needs are met as locally as possible.

6.27. As outlined above, the site provides four fundamental concepts that make the location of the Site sustainable. Which, as a combined framework, achieve the three values of sustainability (economic, social and environmental). These are:

- The provision of a comprehensive public and active transport network;
- The provision of on-site employment opportunities;
- The provision of on-site community and social facilities; and,
- The provision of green infrastructure.

6.28. Whilst further work will need to be carried out as part of a Sustainability Appraisal, the initial environmental assessments undertaken to date clearly demonstrate that the Site, through sound design principles and an extensive range of on-site employment, community and green infrastructure facilities, has significant potential to form a sustainable community which is integrated into Kesgrave.
7.0 Alternative Strategies

7.1. The Council is currently assessing three strategies for the provision of growth in the District. All three see East of Ipswich as a focus for growth, but range from 27-50% of growth targeted in this area. We contend that strategies which do not seek to focus the maximum amount of growth in the East of Ipswich area are based on flawed reasoning, given the underlying principle which is driving growth in the District: economic growth in the Ipswich and East of Ipswich area.

7.2. The East of Ipswich approach will focus growth along the key A12 transport corridor where further transport investments are proposed in the form of the northern relief road. This approach not only takes advantage of the existing strategic transport infrastructure, but also ties into future growth. Furthermore, concentrating housing proposals as close as possible to employment opportunities increasing the viability of public and active transport to make a contribution to reducing the use of the private car in new developments. An approach which scatters growth amongst the entire housing market area would not achieve such results, given the intervening distances and lengths of journeys which would introduce barriers to public and active travel choices.

7.3. Within the East of Ipswich strategy, there are a number of potential sites highlighted as having the potential for growth. We have provided a brief assessment of four large sites within close proximity to the Site - identified in Figures 7a, 7b, 7c and 7d. These sites are addressed in this section, to assess their suitability for development. The sites are referred to within the Issues and Options Consultation Document as Sites 870, 485, 522 and 142. The Council within the Public Consultation document provided no specific sustainability score or ranking of preference for the listed sites. It is assumed that all sites that were submitted to the Council as part of the Call For Sites Public Consultation have been included in the Issues and Options Consultation.

7.4. It is considered that the Site (identified as Site 520 within the Issues and Options Public Consultation Document) is superior to the surrounding identified sites given its location and potential connections to Ipswich Town Centre and areas further east, following the existing trend of development. The proposed framework for the site also incorporates facilities and infrastructure that create a sustainable neighbourhood that can thrive as a single entity; however is complimentary to the surrounding developments and uses.

7.5. Site 870 is located to the north of the site along the A1214 and is referred to as land at Kiln Farm, Main Road. The site has an area of 138.7ha and has been submitted for residential development being able to accommodate approximately 4,160 new homes (indicative number based on a yield of 30 dwellings per ha).

7.6. It is considered that further development within this site, particularly of the scale proposed, will be at risk of creating an urban sprawl effect between Rushmere St Andrew and Kesgrave; merging the two neighbourhoods. The Grainger plc site will present as a modest extension to Kesgrave and maintain clear boundaries, distances between settlement areas.
7.7. Site 522 is located directly to the east of the site, also along Foxhall Road. The area encompasses Foxhall Stadium and is 32.8ha in area. The site has been submitted as a residential development, with a view of accommodating approximately 990 dwellings (based on a yield of 30 dwellings per ha).

7.8. As mentioned, Site 522 already accommodates Foxhall Stadium, an international motorsport-racing track, which hosts a number of local and national events. The stadium is also utilised by the local community for regular Car Boot sales. The further development of this site is questioned, given the obvious impact on the activities of the Stadium, which could ultimately jeopardise its vitality. Extensive amounts of mitigation measures would need to be explored in relation to noise, traffic and air emissions, before this site could seriously be considered for future development. Potential buffer zones and additional design requirements for future dwellings, as well as limitations on the operating times of the Stadium are a few avenues that would need to be explored. Overall, it is considered that the stadium is an incompatible use for a sensitive development such as residential housing.

7.9. In addition to the above, the site accommodates significant woodland, which offers a noise buffer to surrounding neighbourhoods. Any further development on this site would result in significant felling and loss of natural wildlife habitats.

7.10. Site 522 is also located within the Special Landscape Policy Area (SSP38) under the adopted Local Plan, which seeks to minimise adverse impacts on the qualities of the landscape that make it special. The adopted Local Plan aims to protect these areas ‘from development such as infilling where it would be detrimental to the character, spacing, or density of a particular area’.

7.11. Site 142 is located within Martlesham to the east of the site, described as Land North of 1-30 Woodside Waldringfield Road. It is 48.2ha in area and has been nominated for a mixed-use development. No indicative number of homes has been provided for Site 142 within the consultation document; however applying 30 dwellings per ha method would result in an approximate yield of 1,446 units.

7.12. Once again, Site 142 accommodates significant woodland habitat and any further development of this site would require significant felling. This in turn, would result in the loss of native wildlife habitat and create further recreational pressures on nearby SPAs (Deben Estuary and Stour and Orwell Estuaries).

7.13. In addition to the environmental constraints faced by the site, it is also located within close proximity to an Area of Outstanding Beauty, Suffolk Coast and Heaths. As such, impacts upon the landscape, views and setting of the site will need to be seriously considered. It is considered that any proposed development over the site will result in significant impacts on the landscape setting of Suffolk Coast and Heaths and as such, this site should not be considered for future development.
7.14. Site 485 is a large site that comprises 143.6ha and is located to the south of the Grainger plc Kesgrave site at the intersection between the A12 and A14. The site has been promoted as a mixed-use development and, again, does not specify an indicative number of houses; however based on a method of 30 dwellings per ha, could have the potential to accommodate 4,308 dwellings. It should be noted that this is a gross estimate and does not take into account any site constraints.

7.15. In the context of the surrounding neighbourhoods, of Kesgrave, Martlesham Heath and Adastral Park this site could be viewed as overdevelopment and excessive in comparison to surrounding developments. Although the Local Plan Review process has identified a need for additional housing supply, the supply should be evenly distributed amongst the District of Suffolk Coastal so as to avoid excessive pressures on local infrastructure and facilities. The development of this site, at a large scale, would not achieve this and may be perceived as an isolated pocket of development in a largely rural/undeveloped setting.
8.0 Summary

8.1. Grainger has a vision for a sustainable new neighbourhood at land located to the south of Kesgrave, which will assist Suffolk Coastal Council in providing for Ipswich and Suffolk Coastal's long-term housing needs in a sustainable location in close proximity to Ipswich. As part of a broader conversation for the East of Ipswich area, Grainger would be happy to take part in further discussions with the Council and other relevant stakeholders on forthcoming housing proposals, and the locations, timings and scale of these, and how the proposed new neighbourhood at Kesgrave sits within the wider picture.

8.2. The new neighbourhood to the immediate south of Kesgrave will provide around 1,300 homes supported by community, social and green infrastructure. There are five key principles which underpin the design of the site:

1. A connected street network that supports a public and active transport network;

2. The provision of commercial units, offices and workshops to support local businesses;

3. On-site community and social facilities to address existing capacity constraints and additional pressure arising from new development;

4. The potential for a restored Listening Station at the heart of a new civic space with an enhanced Suffolk Aviation Heritage Museum, and

5. The provision of a significant level of green infrastructure, to divert pressure from the SPA and to enhance connectivity for existing residents to woodlands and the Mill River to the south.

8.3. Together, these principles, and the design response to them, result in a neighbourhood which achieves the three concepts of sustainability as set out in the National Planning Policy Framework (NPPF): economic, social and environmental. The site is therefore considered to be one that is suitable for allocation as part of the Local Plan Review for a new mixed-use community of around 1,300 homes, employment opportunities, a new primary school, a GP surgery and a restored and enhanced Aviation Museum within an attractive parkland setting.

8.4. The scope and timing of infrastructure and services which are proposed for the site will be driven by conversations with key stakeholders and infrastructure providers, and we look forward to working with these bodies.
Appendix A – Report on Objectively Assessed Housing Need
SUFFOLK COASTAL DISTRICT COUNCIL

ISSUES AND OPTIONS FOR THE SUFFOLK COASTAL LOCAL PLAN REVIEW

REPORT ON OBJECTIVELY ASSESSED HOUSING NEED
1. **INTRODUCTION**

1.1 This paper is prepared by Pegasus Group regarding matters concerning the objectively assessed housing need as part of the Suffolk Coastal Local Plan Review.

1.2 This report has been commissioned by a number of parties in support of individual representations to the questions raised within the current Suffolk Coastal Local Plan Review Issues and Options consultation (August 2017).

1.3 This report is framed in the context of the requirements of the Suffolk Coastal Local Plan Review to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 182. For a Plan to be sound it must be:

   - **Positively Prepared** – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
   - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
   - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
   - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.4 It is noted that the Issues and Options consultation represents the initial stage in the review process. This paper considers the matter of objectively assessed housing need, particularly the Ipswich and Waveney Housing Market Areas (HMA) Strategic Housing Market Assessment (SHMA) dated May 2017, which forms part of the evidence base to the Review of the Suffolk Coastal Local Plan.

1.5 The report also comments on options for housing growth to the extent that there is overlap with the criticisms of the SHMA and an analysis of population characteristics in the District and the ability to support economic growth.
2. THE IPSWICH AND WAVENEY HOUSING MARKET AREAS STRATEGIC HOUSING MARKET ASSESSMENT (MAY 2017)

2.1 The Ipswich and Waveney SHMA was produced by Peter Brett Associates (PBA) and published on 12\textsuperscript{th} May 2017. The SHMA comprises two parts, part 1 is intended primarily to produce conclusions on objectively assessed housing need (OAN), part 2 deals with housing mix and tenure, and affordable housing need. The SHMA is further subdivided reflecting the market geography of the area, the Ipswich HMA comprising the local authorities of Ipswich, Mid-Suffolk, Babergh and Suffolk Coastal, with Waveney dealt with as a separate, self-contained HMA.

2.2 The SHMA identifies the OAN for each local authority within the Ipswich and Waveney HMA over the period 2014 to 2036. For the Ipswich HMA the SHMA identifies a total OAN of 1,786 dwellings per annum over the period 2014 to 2036, and for Suffolk Coastal a total of 460 dwellings per annum over this 22-year period.

\textit{Ipswich HMA and Suffolk Coastal Demographic Evidence}

2.3 The SHMA correctly identifies that the appropriate starting point for an objective assessment of housing need is the Department of Communities and Local Government (DCLG) sub-national household projections, the most recent series of which are the 2014-based sub-national projections. To convert households into dwellings the SHMA also appropriately uses a rate for vacant and second homes taken from the Census 2011 of 8.3%.

2.4 The population projections produced by the Office for National Statistics (ONS), on which the household projections are based, are very significantly influenced by migration patterns over time. However, the ONS projections are based on a short-term five-year period (six years for international migration) which can be unstable and unreliable. As the SHMA itself states, the choice of the base period from which trends from previous years are carried forward is critical to any projection.

2.5 Surprisingly therefore, the SHMA choses a five-year base period, updated by one year from the 2014-based ONS/DCLG projections using the 2015 Mid-Year Estimates. As Table 5.3, page 44 from the SHMA shows, this produces significantly different results both across the HMA, but particularly in Suffolk
Coastal, when compared to longer-term trend based projections. The Planning Advisory Service Technical Advice Note on objectively assessed housing needs and housing targets, written by PBA (July 2015), describes the choice of an appropriate base period at page 23 of the document. The Note, referring to guidance in the Planning Practice Guidance (PPG) at paragraph 2a-017, states that projections are useful only if they roll forward longer-term trends that are reasonably stable over time, and goes on to say that a five-year base period, such as that used in ONS projections are less stable, other things being equal, than a ten to fifteen-year base period.

2.6 The Local Plans Expert Group (LPEG) was established by the previous Government in September 2015 with a remit to consider how local plan making can be made more efficient and effective. A report to the Government was published by LPEG in March 2016 setting out a standardised methodology for deriving an OAN. PBA made representations to LPEG on this matter, prepared in April 2016 alongside the University of Manchester and Neil McDonald. The LPEG conclusions for a standardised methodology for calculating OAN propose that the population should be based on the higher of either the official projection (five-year trends) or a projection obtained using a ten-year trend to the latest ONS Mid-Year Estimates (MYE). The representations to the LPEG report by PBA et al criticised the proposed upward only adjustment and instead suggested the use of a consistent ten-year period for which data are available (i.e. the latest MYE) on which to base the projected migration flows and hence derive the demographic baseline.

2.7 In contrast, the SHMA concludes that a five-year base, updated to the 2015 MYE should be used to derive the demographic base in the HMA and Suffolk Coastal. The explanation for this choice is the impact of international migration from the 8 European Union (EU) countries (the EU8) who acceded to membership in 2004 has on longer-term trends. It is the case that international net migration in Suffolk Coastal, and the HMA as a whole, peaked in 2004-05, and the effect of this is therefore picked up in a trend over a longer period commencing in 2001. However, it is also of significance that international net migration has declined very significantly in the most recent five-year period, which the SHMA chooses as the period to derive its baseline demographic forecast, as illustrated in the table below.
Table 1: DCLG Net Migration Estimates over the period 2001 – 2016: Suffolk Coastal

<table>
<thead>
<tr>
<th></th>
<th>Internal Net Migration</th>
<th>International Net Migration</th>
<th>Net Migration</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001 - 2002</td>
<td>979</td>
<td>3</td>
<td>982</td>
</tr>
<tr>
<td>2002 - 2003</td>
<td>1156</td>
<td>324</td>
<td>1480</td>
</tr>
<tr>
<td>2003 - 2004</td>
<td>1470</td>
<td>335</td>
<td>1805</td>
</tr>
<tr>
<td>2004 - 2005</td>
<td>1428</td>
<td>525</td>
<td>1953</td>
</tr>
<tr>
<td>2005 - 2006</td>
<td>1633</td>
<td>157</td>
<td>1790</td>
</tr>
<tr>
<td>2006 - 2007</td>
<td>2138</td>
<td>100</td>
<td>2238</td>
</tr>
<tr>
<td>2007 - 2008</td>
<td>969</td>
<td>100</td>
<td>1069</td>
</tr>
<tr>
<td>2008 - 2009</td>
<td>429</td>
<td>-98</td>
<td>331</td>
</tr>
<tr>
<td>2009 - 2010</td>
<td>660</td>
<td>43</td>
<td>703</td>
</tr>
<tr>
<td>2010 - 2011</td>
<td>536</td>
<td>47</td>
<td>583</td>
</tr>
<tr>
<td>2011 - 2012</td>
<td>187</td>
<td>-157</td>
<td>30</td>
</tr>
<tr>
<td>2012 - 2013</td>
<td>859</td>
<td>-403</td>
<td>456</td>
</tr>
<tr>
<td>2013 - 2014</td>
<td>797</td>
<td>-123</td>
<td>674</td>
</tr>
<tr>
<td>2014 - 2015</td>
<td>849</td>
<td>-115</td>
<td>734</td>
</tr>
<tr>
<td>2015 - 2016</td>
<td>1275</td>
<td>-148</td>
<td>1127</td>
</tr>
<tr>
<td>5 Year Trend (11-16)</td>
<td>793</td>
<td>-189</td>
<td>604</td>
</tr>
<tr>
<td>10 Year Trend (06-16)</td>
<td>870</td>
<td>-75</td>
<td>795</td>
</tr>
<tr>
<td>15 Year Trend (01-16)</td>
<td>1024</td>
<td>39</td>
<td>1064</td>
</tr>
</tbody>
</table>

2.8 Figure 1 below sets out the information above in graphic form. It is clear from both Table 1 and Figure 1 that international migration plays a relatively small part as a component of total net migration in Suffolk Coastal. It is internal net migration that is the main driver of population change in the district. There was a notable peak in internal net migration in 2006/07, probably associated with the peak in completions in the expansion areas to the east of Ipswich at the time. The growth in net internal migration to 2007 also reflects the significant period of economic growth during this time, in contrast into the effects of the recession which are clearly visible in the precipitous decline to 2009 which followed. This pattern is repeated in a number of places across the country, especially where rural areas have historically been the destination for internal migration from adjoining towns or cities. What is also observable now is a steady increase in net internal migration, and total net migration, as economic circumstances improve. However, in Suffolk Coastal this growth has been faltering in the early years of the recovery from recession, explained in part by constraints on the supply of housing land.
2.9 The SHMA chooses to focus on international net migration as the reason for the choice of a short-term trend based projection, and therefore this focus is worthy of further examination. On 25th May 2017 the ONS produced a statistical bulletin entitled Migration Statistics Quarterly Report - May 2017. This document provides the most up to date summary of international migration and it is particularly relevant to the point at issue in that it observes the significance more recently of the decrease in immigration and the increase in emigration of EU citizens, driven by significant increases in both components from EU8 citizens.

2.10 Whilst this data is at a national level and making assumptions about effects locally must be done with caution, the SHMA considers the impact of the EU8 accession in 2004 to have been ‘felt more acutely’ in the HMA, and a ‘unique migration trend’, although no evidence is adduced to support this contention. This lack of evidence to support a departure from more robust and representative long term trends is a flaw in the SHMA. Even if the SHMA’s assessment of the effects of EU8 citizens on international migration trends is correct, the significant decreases in international net migration experienced in the HMA and Suffolk Coastal in the five-year based trends, seems to be a reversal of the earlier peak of net international migration based on the ONS observations about EU8 citizens in the May 2017 report.
2.11 The evidence from the international migration figures in Suffolk Coastal certainly does not support the use of short-term trends and more stable and robust projections will be provided if a longer-term base period is used. This will include what PBA has identified as the exceptional peak in net international migration, and a corresponding trough more recently, supported by evidence from the most up to date ONS report on international migration. It will also better reflect the peaks and troughs of internal net migration driven by the economic growth of the mid-2000’s and the recession that followed. In short, the SHMA uses short-term trends which reflect a period of reduced total net migration compared to longer-term trends which include both peaks and troughs and are thus a much more reliable basis for population projections.

2.12 The use in the SHMA of a short-term trend based projection of migration in order to derive a baseline demographic forecast is seriously flawed. Indeed, the SHMA itself notes this flaw at paragraph 5.38. It states:

In addition, a ten-year trend was also modelled, but it became apparent that the influence of low levels of net migration in the years immediately following the recession were distorting the projections

2.13 The SHMA having correctly identified the flaw in using trends which are distorted by more recent events, then opts for a shorter-term trend which magnifies these further, instead of using the 14-year trend in the document which encompasses the peaks and troughs in net migration.

2.14 In relation to migration, the report also considered whether to include Unattributed Population Change (UPC) in the population projections. The report notes that the impact of UPC is insignificant for all authorities except Ipswich, and even for Ipswich it makes only a modest difference. Whether UPC should be included in the projections is a matter of judgement, and PBA are candid in acknowledging that they have no evidence to support their judgement that it should. The ONS is clear that UPC is not be included in projections and in the context of the Ipswich HMA it should only be included, if at all, in relation to Ipswich. Certainly, its inclusion in Suffolk Costal does not accord with the view of PBA that it would support positive planning by increasing housing requirements as it is a negative figure.

2.15 Based on the evidence contained in the SHMA itself, therefore, it would be more appropriate to conclude that the alternative projection known as CRG14X, set out
in Table 5.3, should be used to derive the baseline demographic projection; that is a projection based on a 14-year migration trend and excluding UPC. The benefits of a longer-term projection which take account of peaks and troughs in net migration is clearly preferable, as noted in the SHMA itself at paragraph 5.38.

2.16 The projection contained in the SHMA which uses a 14-year trend period (produced prior to the release of the 2016 MYE) generates a demographic baseline figure of 636 dwellings per annum (SHMA table 5.3) for Suffolk Coastal, over the period 2014-2036.

*Market Signals*

2.17 The SHMA contains an analysis of factors, including market signals, which can help understand the extent to which there has been failure of the supply of housing to keep pace with demand and the extent that an uplift above the demographic baseline is required. At paragraphs 6.1-6.6 in the SHMA there is a cogent explanation of the purpose of this exercise, and the approach of looking at past delivery alongside market signals for the reasons set out in paragraph 6.2 is clearly correct.

2.18 Paragraph 6.2 is clear that the assessment of past delivery should be measured against the demand, or need for housing. This can be very different to the ‘targets’ or requirements set out in plans, and this is particularly the case in Suffolk Coastal. The analysis in paragraphs 6.17, 6.18 and Figure 6.5 in the SHMA misses entirely the point that plan targets in Suffolk Coastal, and the Core Strategy target of 465 in particular, are lower than housing need. At the time of the adoption of the Core Strategy, as set out previously, the OAN for housing in Suffolk Coastal was 11,000 over the period 2010-27, or 647 dwellings per annum, and when delivery is measured against need in this way the disparity is pronounced and longstanding.

2.19 Set out below in Table 2 are the delivery rates for Suffolk Coastal 2001 – 2017 set against the OAN endorsed in 2013 of 11,000, 2010-2027. In addition, and as a proxy for actual OAN earlier in this period are the various household projections published at the time. Importantly, these are household projections, which would need to be converted to dwellings taking account of vacancies and second homes (8.3% from the census 2011). Table 2 illustrates the point referred to in paragraph 6.2 of the SHMA, "... if past supply under delivered against demand,
2.20 In this respect, the downward trend in household projections set out in the table below is in large part explained by the persistent failure of supply to meet demand. In an area of high demand for property and acknowledged affordability issues, and in common with other similar areas in the country, the age profile of the population in Suffolk Coastal has moved disproportionately upwards. This has led to a situation where the 2014-based population projections show natural change alone leading to a decline in the population of the District of over 10%, -13,241, over the period 2014-2036.

Table 2: Performance of delivery rates vs Plan Targets

<table>
<thead>
<tr>
<th></th>
<th>Net Additional Completions</th>
<th>Annualised Plan Target RSS 2008</th>
<th>Annualised Plan Target Core Strategy 2013</th>
<th>Annualised OAN identified in Core Strategy 2013</th>
<th>CLG SNHP (Annualised 2011-2031 households only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/ 2007</td>
<td>1,150</td>
<td>510</td>
<td>-</td>
<td>-</td>
<td>1,100¹</td>
</tr>
<tr>
<td>2007/ 2008</td>
<td>694</td>
<td>510</td>
<td>-</td>
<td>-</td>
<td>1,100¹</td>
</tr>
<tr>
<td>2008/ 2009</td>
<td>550</td>
<td>510</td>
<td>-</td>
<td>-</td>
<td>1,030²</td>
</tr>
<tr>
<td>2009/ 2010</td>
<td>256</td>
<td>510</td>
<td>-</td>
<td>-</td>
<td>1,030²</td>
</tr>
<tr>
<td>2010/ 2011</td>
<td>216</td>
<td>465</td>
<td>647</td>
<td>1,030²</td>
<td></td>
</tr>
<tr>
<td>2011/ 2012</td>
<td>270</td>
<td>465</td>
<td>647</td>
<td>710³</td>
<td></td>
</tr>
<tr>
<td>2012/ 2013</td>
<td>324</td>
<td>465</td>
<td>647</td>
<td>452⁴</td>
<td></td>
</tr>
<tr>
<td>2013/ 2014</td>
<td>215</td>
<td>465</td>
<td>647</td>
<td>452⁴</td>
<td></td>
</tr>
<tr>
<td>2014/ 2015</td>
<td>427</td>
<td>465</td>
<td>647</td>
<td>365⁵</td>
<td></td>
</tr>
<tr>
<td>2015/ 2016</td>
<td>564</td>
<td>465</td>
<td>647</td>
<td>365⁵</td>
<td></td>
</tr>
<tr>
<td>2016/ 2017</td>
<td>550</td>
<td>465</td>
<td>647</td>
<td>365⁵</td>
<td></td>
</tr>
</tbody>
</table>

Source: Suffolk Coastal
¹CLG 2006 SNHP
²CLG 2008 SNHP
³CLG 2011 Interim SNHP
⁴CLG 2012 SNHP
⁵CLG 2014 SNHP

2.21 The conclusion in the SHMA is that an uplift of 15% above the demographic baseline of 400 dwellings per annum is appropriate in Suffolk Coastal. Given the context of the failure of supply to meet demand, as opposed to simply housing targets, this uplift can be judged to be inadequate. Choosing a demographic baseline which reflects the low levels of migration recorded in the short-term is a serious flaw in the SHMA which cannot be rectified by an uplift of the scale proposed.
2.22 The PBA SHMA takes the appropriate step of testing the extent to which the preferred demographic projection would provide a labour force sufficient to match future jobs growth expected in the District. This is in accordance with the requirements of the PPG at paragraph 2a-018.

2.23 The PBA SHMA relies on an Experian forecast to test the balance between labour force and jobs growth. As is clear from the explanation contained in the SHMA at paragraphs 7.18, 7.19 and 7.25, the Experian Model is population-led and uses the 2014-based ONS projections. It therefore sets the population levels as a control and ‘allows’ other variables to ‘flex’, in a way which is not explained, so as to match the resultant labour force growth with that required to meet ‘Jobs Demand’ in the District. ‘Jobs Demand’ is explained in paragraph 7.34 somewhatopaquely, but implies a jobs forecast based on applying sector growth rates to the structure of the local economy.

2.24 A key feature, therefore, of the Experian Model is the adjustments made to the principle factors which dictate the relationship between population and the labour force namely the unemployment rate, commuting ratio and economic activity rate assumptions. In the SHMA, it is clear from Table 7.2 that of these, the activity rate assumptions are the most important.

2.25 The employment forecasts underpinning the SHMA assume a significant rise in economic activity (EA) amongst people aged 65+. In Suffolk Coastal economic activity rates for this age group are forecast to more than double from 13.7% in 2014 to over 28% by 2036. This generates an additional 9,900 people in the labour force, which is expected to fill a significant proportion of new jobs created over the SHMA period.

2.26 The issue of increasing economic activity amongst people aged 65+ is significant. Drawing on data published by the Office for National Statistics as part of its Labour Force Survey (LFS), further analysis has therefore been undertaken to assess the extent to which the assumed rise in economic activity is feasible.

2.27 The analysis is based on LFS data for January-March 2017, showing industry of employment by age group (16-64 & 65+). Data is not available down to a District
level, and to ensure the most robust analysis possible, the East of England region has been used, the reason being that it gives a larger sample area and therefore more reliable results. The UK has also been analysed to provide a benchmark comparison.

2.28 Table 4 shows industry of employment by age. With the exception of agriculture, forestry & fishing and real estate activities, people aged 65+ account for less than 10.0% of the workforce in every other sector – both in the East of England and UK. This includes many of the sectors that are expected to drive jobs growth in the Suffolk Coastal area, notably: construction; transport & storage; accommodation, food services & recreation; and information & communication.

<table>
<thead>
<tr>
<th>Industry</th>
<th>Total</th>
<th>16-64 East of England</th>
<th>16-64 UK</th>
<th>65+ East of England</th>
<th>65+ UK</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, forestry and fishing</td>
<td>86%</td>
<td>81%</td>
<td>14%</td>
<td>19%</td>
<td></td>
</tr>
<tr>
<td>Mining and quarrying</td>
<td>100%</td>
<td>97%</td>
<td>0%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Manufacturing</td>
<td>97%</td>
<td>97%</td>
<td>3%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Electricity, gas, air con supply</td>
<td>100%</td>
<td>99%</td>
<td>0%</td>
<td>1%</td>
<td></td>
</tr>
<tr>
<td>Water supply, sewerage, waste</td>
<td>97%</td>
<td>97%</td>
<td>3%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td>97%</td>
<td>97%</td>
<td>3%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Wholesale, retail, repair of vehicles</td>
<td>94%</td>
<td>96%</td>
<td>6%</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td>Transport and storage</td>
<td>96%</td>
<td>95%</td>
<td>4%</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Accommodation and food services</td>
<td>97%</td>
<td>98%</td>
<td>3%</td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td>Information and communication</td>
<td>94%</td>
<td>98%</td>
<td>6%</td>
<td>2%</td>
<td></td>
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<tr>
<td>Financial and insurance activities</td>
<td>92%</td>
<td>98%</td>
<td>8%</td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td>Real estate activities</td>
<td>85%</td>
<td>93%</td>
<td>15%</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td>Prof, scientific, technical activities</td>
<td>96%</td>
<td>95%</td>
<td>4%</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Admin and support services</td>
<td>96%</td>
<td>96%</td>
<td>4%</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td>Public admin and defence</td>
<td>97%</td>
<td>98%</td>
<td>3%</td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td>Education</td>
<td>96%</td>
<td>97%</td>
<td>4%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Health and social work</td>
<td>96%</td>
<td>97%</td>
<td>4%</td>
<td>3%</td>
<td></td>
</tr>
<tr>
<td>Arts, entertainment and recreation</td>
<td>95%</td>
<td>95%</td>
<td>5%</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Other service activities</td>
<td>95%</td>
<td>95%</td>
<td>5%</td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>95%</strong></td>
<td><strong>96%</strong></td>
<td><strong>5%</strong></td>
<td><strong>4%</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: LFS, April-June 2017

2.29 Given the ageing population, it is not unreasonable to assume that economic activity rates amongst people aged 65+ will see an increase in the future. However, analysis of the LFS data and the current structure of the labour force suggests that the sectors will still see the majority of their labour force drawn from the age group below 65. For this not to be the case, any changes over the
next few years would have to be on a scale not seen before, as this group of people accounts for such a high proportion of jobs.

2.30 To put the SMHA analysis into context, it forecasts that the population of Suffolk Coastal aged 65+ will increase by around 18,000 between 2014 and 2036. This equates to overall growth of around 56%, yet the increase in people aged 65+ who are economically active translates to a rise of 223% – almost four times higher (see Table 5). Given the emphasis placed by the SHMA on jobs being taken by older residents, there is a significant risk that the resulting future housing requirements substantially underestimate the number of new homes needed for people who move to the area in the future.

Table 5: Economic activity of Suffolk Coastal Residents Aged 65+, 2014-36

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2036</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population - 65 plus</td>
<td>32,430</td>
<td>50,630</td>
<td>18,200</td>
</tr>
<tr>
<td>Economic activity rate - 65 plus</td>
<td>13.71%</td>
<td>28.34%</td>
<td>-</td>
</tr>
<tr>
<td>Number of people economically active aged 65+</td>
<td>4,446</td>
<td>14,349</td>
<td>9,902</td>
</tr>
</tbody>
</table>

Source: Ipswich and Waveney Housing Market Areas SHMA, Part 1. May 2017

2.31 The Experian model does not test objectively the extent to which a labour force will be generated by the demographic baseline projection sufficient to meet the anticipated jobs growth demand. This is evident from the extent to which economic activity rates for the 65+ population are increased in the model beyond what is reasonable to assume.

2.32 The activity rates that the Experian model generates in order to balance labour supply and jobs demand have often been the subject of debate and disagreement.

2.33 The SHMA contrasts the latest sets of forecasts produced by the East of England Forecasting Model (EEFM) in August 2016, with its own forecasts using the Experian model. The SHMA contains a section from pages 67-69 which explains the EEFM Model, which concludes at paragraph 7.14 that the housing numbers derived from the model are jobs-led, and show the number of dwellings required to meet housing demand including the demand resulting from changing job opportunities. As the SHMA indicates, the levels of jobs growth that both models imply are not significantly dissimilar, including in Suffolk Coastal. However, and to the apparent "surprise" of PBA, the difference in the methodologies produces a
very significant difference in the labour force and hence population and housing growth. This difference is not a new phenomenon and hence it is unclear why PBA find it surprising.

2.34 At Table 7.4 in the SHMA (page 73) figures are presented which purport to show the outputs of the EEFM August 2016 forecasts for the Ipswich HMA authorities over the period 2014-2036. However, in comparing the numbers of households and dwellings indicated in this table with those shown on the spreadsheets outputs published on the EEFM website, there are significant disparities. In relation to Suffolk Coastal District the number of dwellings forecast in the August 2016 EEFM is 17,100 dwellings or 777 dwellings per annum.

2.35 The SHMA then compares the outputs from the EEFM (notwithstanding the inaccuracies apparently contained in table 7.4) with a forecast by Experian which they use to test the extent to which an assumed population change will generate the labour force needed to meet jobs demand. However, this is an exercise which is somewhat pointless, as all the other variables in the model are changed in the same way as previously and the result is unsurprising in allegedly supporting the Experian view of the extent to which the demographic baseline will provide a sufficient labour force.

2.36 There is clearly a stark difference between the results of the EEFM forecasts which indicate the need for a significantly higher population and hence dwellings to provide a labour force that will meet jobs growth, and the Experian model which indicates the demographic base will provide a sufficient workforce for a comparable jobs growth.

Conclusions

2.37 It is therefore considered that the SHMA is deficient in providing a robust OAN for Suffolk Coastal in three particular regards:

- The use of short term migration trends as the basis for deriving a baseline demographic projection of housing need.

- The inadequacy of the assessment of past under-delivery of housing in order to establish the extent to which an uplift to the baseline demographic need should be applied.
• The use of un-justified and unrealistically high activity rates for the over-65 age group in order to balance jobs growth with the demographic baseline.

3.1 Following the publication of the Housing White Paper earlier in 2017, on 14th September 2017 the Government published Planning for the right homes in the right places: consultation proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The proposals include a new standard method for calculating local authorities’ housing need.

3.2 The proposed standard methodology uses the annual average household growth over a 10-year period taken from the official household projections as the demographic baseline. It is then proposed that an adjustment is made to take account of market signals, where appropriate, based on affordability (the latest published data on the ratio of median house price to workplace-based median earnings). A formula is proposed to determine a level of uplift that seeks to ensure more homes are delivered in the locations where affordability is worst. The level of increase can be capped, however, according to the status of the local plan in the authority area, whereby the increase is limited to 40% above the local plan where adopted in the last five years, or 40% above the higher of the household projections or the figure in the Local Plan if adopted more than 5 years ago.

3.3 As part of the consultation proposals the Government has issued a Housing Need Consultation Data Table, which sets out the housing need for each local planning authority using the proposed method over the period 2016 to 2026. The data in this tables uses the latest 2014-based sub-national household projections.

3.4 For Suffolk Coastal the Government’s proposed standardised method indicates a housing need of 495 dwellings per annum. This is based on an affordability uplift to the 2014-based sub-national household projections. Note that this is 35 dwellings per annum more than the SHMA.

3.5 For the Ipswich HMA the Government’s proposed standardised method indicates a housing need across the four authorities (Babergh, Ipswich, Mid Suffolk and Suffolk Coastal) of 1,949 per annum, which is higher than the 1,786 per annum in the SHMA, with notable increases in Babergh and Mid Suffolk District’s and an
increase of 35 per annum in Suffolk Coastal. The Government’s consultation figure for Ipswich is lower, at 442 dwellings per annum, compared to the SHMA which sets out a need for 519 per annum.

3.6 The standard methodology is currently subject to consultation which closes on 9th November 2017. The standard methodology is expected to apply in Spring 2018 with the publication of the revised National Planning Policy Framework.

3.7 According to the timetable for the aligned/joint Local Plan Review, the submission of the Suffolk Coastal Local Plan Review is expected in February 2019, by which time it is reasonable to assume that the standard methodology will apply, in whatever final form it takes. As the consultation has yet to close at the time of writing, it is inappropriate to assume the standard method proposed will remain unchanged.

3.8 It is also important to note that, even in the event the standard method proposed in the consultation is given effect unchanged through alterations to the Framework and Planning Practice Guidance, the data inputs will change annually. Updated affordability ratios are expected to be published in February 2018 and February 2019 and updated household projections are likely to be published mid-2018. In light of these factors, the figures set out in the Government’s current consultation are subject to change during the course of plan preparation in Suffolk Coastal.

3.9 The Local Plan Review is therefore highly likely to be overtaken by events and relatively soon the assumptions and methodology which underpins the SHMA will be inconsistent with Government policy and guidance, and rendered obsolete. It would not be appropriate to continue to base the Review of the OAN, and hence the Local Plan, on the evidence contained within the SHMA.

3.10 At the very least, and given that the standardised methodology is subject to consultation at this time, until the point of adoption of the final methodology (expected Spring 2018) the Local Authority should be planning for sufficient contingency in the assumptions as to the housing requirement for the District.
4. HOW MUCH GROWTH? THE NUMBER OF HOMES AND JOBS THAT SHOULD BE PLANNED FOR

4.1 Underpinned by the evidence contained within the PBA SHMA, in their Issues and Options consultation document Suffolk Coastal District Council set out three growth scenarios for the District over the period 2014-2033. The first, Scenario A, is a baseline trend scenario which uses the OAN from the SHMA and job forecasts from the East of England Forecasting Model (EEFM). The second, Scenario B, is a policy-led scenario for significant economic growth identified as a ‘medium increase in growth’. The third is Scenario C, which is an infrastructure delivery-led scenario seen as a ‘high increase in growth’.

4.2 All three scenarios utilise the OAN as set out in the SHMA and therefore considering the concerns raised in Section 2 of this report it is considered that the identified number of dwellings determined under each scenario is based on evidence that is seriously flawed. The emergence of a standard methodology for determining local housing need will also mean the SHMA will be out of date.

4.3 Whilst there is objection maintained in this response as to the OAN determined for each Local Authority in the SHMA, exploring options for higher numbers of dwellings and jobs above the baseline OAN is, however, supported in principle.

4.4 Several key social, environmental and economic issues are identified for Suffolk Coastal. Focussing on social issues, the Issues and Options document identifies that, despite an expected growth in population of 8,259 people between 2014 and 2036 (taken from the 2014-based sub-national population projections), there will be an increasing number of young people leaving the District with the District’s population older than the county, regional and national averages. This issue is highlighted within Table 1 of the Issues and Options document which shows population growth in the District to be driven by net migration. Natural change would result in a decline in the population due to high mortality rates, suggesting an older population. As identified in Section 2 these baseline trends are due to a previous under-supply of housing within the District thus increasing house prices and worsening affordability. Such trends would have had the greatest impact on the younger generations and as such resulting in a disproportionate upward shift in the age profile. Migration to the District is likely to be from older age groups, being the groups most likely to be able to afford to live, work and retire in the District. The Issues and Options document itself notes that the District has seen
increasing high house prices and has high numbers of second homes, with a home costing on average 9 times the average income.

4.5 The vision from the New Anglia Strategic Economic Plan is set out in the Issues and Options document, targeting 95,000 more jobs (50% than forecast), 10,000 new businesses (more than double previous trends) and 117,000 new homes (30% higher than previous delivery) by 2026 across Norfolk and Suffolk. This is relevant to Suffolk Coastal as economic growth is one of the three prongs underlying the vision for the District.

4.6 The Council’s evidence base sets out a baseline projection of 37,070 new jobs across the Ipswich Functional Economic Area (FEA) over the period 2014 to 2036 (1,685 per annum), this is an increase of 17%. Of this total, 7,940 new jobs are projected in Suffolk Coastal, an increase of 13.1%.

4.7 Turning to local economies, Ipswich is seen as the driver of economic growth in the FEA, however Suffolk Coastal is identified for increased growth with particular focus on the Felixstowe/A14 Corridor (characterised by distribution, shipping and sea freight) and the wider Ipswich market area. The A12 is also distinguished as another key route linking Colchester, Ipswich and Waveney and is locally significant for communities in Suffolk Coastal. Suffolk Coastal is also recognised as having the highest number of enterprises in the FEA, a fact which should be seen positively and given continued and increasing support through local policy.

4.8 There is a clear aspiration to see economic growth across the HMA and within Suffolk Coastal, which is supported. Local Plans should seek to implement policies and measures which align with the aspirations and targets of sub-regional economic strategies. It is clear that currently, within Suffolk Coastal, there are challenges, most notably with the population profile of the District. The outmigration of younger workers leaves Suffolk Coastal with a top-heavy population profile dominated by older working-age and retired residents. Considering these trends, as highlighted in Section 2, there is a clear mismatch between the sectors expected to deliver the economic growth and the population profile with an unrealistically high activity rates for the over 65s which do not reflect the typical proportion of workers within those industrial sectors expected to be driving economic growth in the District. Local planning policy should be prepared positively in order to address this challenge and overturn this disparity if there is to be sustainable growth in the local economy and the creation of sustainable communities throughout the District. The delivery of new homes,
particularly affordable homes, and also new employment opportunities ensures that the younger age population can be retained and new younger migrants have the chance and are attracted to live and work in the District. In line with Government policy it is crucial that people of all ages have a choice of where they live and work.

4.9 It is clear that recent trends in Suffolk Coastal District have resulted in such issues arising, therefore looking forward over the next 22 years the Local Plan Review presents an opportunity to address these trends. In light of this, Scenario A, which is based on the continuation of recent trends and modelling forecasts is not supported as this does not sufficiently address the current problems facing the District, as is based on perpetuating the consequences of past under-supply in housing in the District.

4.10 Notwithstanding the concerns over the OAN derived in the SHMA which underpins all three growth options in the consultation, if the economic growth objectives are to be achieved across the HMA/FEA and in Suffolk Coastal District, policy should be aspirational and create an environment which encourages the creation of new jobs aligned with the delivery of additional market and affordable homes beyond what has historically been planned for. Growth in households and jobs from Scenario A is expected to be disproportionately driven by those over the age of 65, further compounding the imbalance of older people to younger people in the District. It is clear that this scenario would not align with the ambitions of the sub-regional economic strategy.

4.11 To help determine whether the employment forecasts in the Issues and Options paper can be considered ambitious enough, it is useful to look at past jobs trends in Suffolk Coastal and the wider FEA. Table 6 presents job change data for the period 2010 to 2015, based on data sourced from the Office for National Statistics (ONS). The FEA saw employment growth between 2010 and 2015 of 8,000 jobs – an annual change of 0.9%. This is a lower annual change than both the East of England region (1.6%) and Great Britain (1.3%). Looking at each individual area within the FEA, Ipswich accounted for the highest proportion of jobs growth at 4,000 (1.2% annual change). Babergh and Mid Suffolk both saw a 0.6% annual increase (1,000 jobs between 2010 and 2016). Finally, in Suffolk Coastal jobs increased by 2,000 – an annual change of 0.8%.
Table 6: Jobs Change by District in Ipswich Functional Economic Area, 2010-16

<table>
<thead>
<tr>
<th>Total Employment</th>
<th>2010</th>
<th>2015</th>
<th>Absolute Change</th>
<th>% Annual Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Babergh</td>
<td>31,000</td>
<td>32,000</td>
<td>1,000</td>
<td>0.6%</td>
</tr>
<tr>
<td>Ipswich</td>
<td>67,000</td>
<td>71,000</td>
<td>4,000</td>
<td>1.2%</td>
</tr>
<tr>
<td>Mid Suffolk</td>
<td>34,000</td>
<td>35,000</td>
<td>1,000</td>
<td>0.6%</td>
</tr>
<tr>
<td>Suffolk Coastal</td>
<td>48,000</td>
<td>50,000</td>
<td>2,000</td>
<td>0.8%</td>
</tr>
<tr>
<td>Ipswich Functional Economic Area</td>
<td>180,000</td>
<td>188,000</td>
<td>8,000</td>
<td>0.9%</td>
</tr>
<tr>
<td>East of England</td>
<td>2,497,000</td>
<td>2,698,000</td>
<td>201,000</td>
<td>1.6%</td>
</tr>
<tr>
<td>Great Britain</td>
<td>27,672,000</td>
<td>29,548,000</td>
<td>1,876,000</td>
<td>1.3%</td>
</tr>
</tbody>
</table>

Source: ONS Business Register and Employment Survey

4.12 Scenario A gives a baseline jobs figure of 7,940 between 2014 to 2036 in Suffolk Coastal, equivalent to an increase of 0.7%. This is lower than the growth seen in the District over the last five years (as outlined in Table 6) and therefore it is welcomed that the Issues and Options paper goes on to present more optimistic scenarios for the area.

4.13 Local Policy should intervene in ensuring that economic growth across the FEA can be achieved. Scenario B advocates a 20% uplift to the OAN of 460 per annum, resulting in an OAN of 552 dwellings per annum and jobs growth of 32,376 (1,472 per annum). This would equate to 9,528 jobs by 2036 if Suffolk Coastal’s share of jobs in the FEA remains the same as the baseline – an annual change of 0.7%. This is still lower than the annual change in employment seen in the District since 2010, however it represents only a very marginal uplift on annual long-term growth when compared with the baseline trends. It is considered that neither the baseline or medium growth scenarios present a particularly ambitious view of long-term growth for the area.

4.14 The uplift is currently indicative, but the principle of an uplift is supported to ensure that housing growth in the District does not constrain growth in the labour force. Key economic development opportunities are cited in Scenario B, such as the expansion of the Sizewell Nuclear Power Station, new offshore energy industries and further support for established sectors such as the Port of Felixstowe and ICT technologies. The New Anglia LEP recognises these as key growth areas with the potential to host high levels of activity and growth. These
growth areas are primarily focussed within Suffolk Coastal District and to ensure sustainable patterns of growth, additional new homes above the baseline OAN should therefore be provided within the District to support the increase in the economically active population, particularly in the younger age groups.

4.15 A further Scenario, Scenario C, is one which is infrastructure delivery-led, seeking a greater uplift to the OAN at 40% to derive a housing requirement of 644 dwellings per annum, but caps the uplift to the trend in jobs growth at 20% as per Scenario B (note that there is no detail as to why the higher growth scenario sees the same level of jobs growth as Scenario B). Scenario C considers the commitment of the Norfolk and Suffolk Devolution Agreement (June 2016) to substantially increase housing delivery and the delivery of significant infrastructure needed to support the delivery of new homes. This scenario acknowledges that Ipswich and those communities around Ipswich, including those within Suffolk Coastal District, are well placed to benefit from the substantial uplift in targets, whilst increasing the prosperity of the county. It states that an infrastructure-led scenario reflects the opportunity to create a more successful and prosperous area which benefits from improved infrastructure supporting the ambitious uplift in the housing requirement. It also acknowledges that this scenario would help to address affordable housing needs in the District.

4.16 The Issues and Options paper refers to the new Strategic Economic Plan (SEP) produced by the New Anglia Local Enterprise Partnership (LEP), which aims for 95,000 more jobs in the LEP area between 2012 and 2026. Suffolk Council currently accounts for 7.3% of jobs in the New Anglia LEP and assuming this share remains broadly similar in the future, the District would see 6,971 additional jobs in the area by 2026. This gives an annual increase of 498 jobs and when this figure is applied to the 2014 to 2036 timeframe in the Issues and Options paper, it equates to 10,954 extra jobs in Suffolk Coastal over the Local Plan period. This translates into annual growth of 0.8%, in line with trends seen in the last five years and outlined in Table 6. The Issues and Options paper needs to use the New Anglia SEP as the starting point for developing a true high growth scenario for Suffolk Coastal when considering the long-term requirements for housing and employment land.

4.17 It is considered that Scenario C would better support the economic aspirations of the sub-region and address the key social issues that are currently facing Suffolk

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1 Based on data from the 2016 Business Register & Employment Survey, published by ONS.
Coastal, including the rebalancing of the population profile, encouraging and allowing younger people to live and work in the area, supported through the greater provision housing near the key employment sources identified. A high growth scenario would also help to deliver the necessary affordable housing. Long-term planning for a higher housing requirement above the baseline OAN would start to favourably shift the balance in the population profile, resulting in an increase in the younger working age population, which is crucial as the sectors expecting to grow in Suffolk Coastal typically have higher proportions of younger workers.

4.18 As has been highlighted in Section 2 of this report, there is concern with the robustness of the OAN as determined in the SHMA. The OAN across the HMA, notably Suffolk Coastal, is deficient and underestimates the OAN based on a number of flawed assumptions that are made. If the correct assumptions are made, the OAN is likely to be higher than the 460 per annum for Suffolk Coastal, evidenced by the fact that if an alternative 14-year migration trend is modelled then this would result in an OAN of 636 dwellings per annum for the District. This has implications on the growth options as set out in the Issues and Options consultation, however the principle of applying an uplift to the OAN across the HMA in line with sub-regional and local economic aspirations is supported.
5. CONCLUSIONS

5.1 The Suffolk Coastal Local Plan Review Issues and Options consultation is underpinned by a SHMA which is seriously flawed with regards to several assumptions that have been made. The findings of the SHMA with regards to the OAN across the HMA and for Suffolk Coastal District cannot be supported and are subject to objection in this report. In light of this it is recommended that the SHMA should be revisited to address the concerns that have been raised and to ensure that it provides a sound basis for determining the correct OAN for the HMA and Suffolk Coastal District.

5.2 Notwithstanding the concerns set out in this report, the current SHMA will be overtaken by events, notably the Government's proposal for a new standard methodology for determining local housing needs, albeit this is currently subject to consultation and the final figures will almost certainly change depending on the final methodology employed and the data inputs used.

5.3 Support is given to a housing requirement over the Local Plan Review period that includes economic considerations and would facilitate the growth in employment above the baseline trends. The District’s aspirations need to be aligned with that of the sub-region and LEP and therefore local planning policies should be planning positively for growth. This requires an uplift to the housing requirement to ensure all employment and housing needs are met and are located in sustainable locations, particularly where such economic growth is likely to targeted. This includes Ipswich, the communities around Ipswich which are within Suffolk Coastal District and other major towns in the HMA, including Felixstowe.

5.4 The current OAN endorsed by the PBA SHMA will only exacerbate the existing economic and social problems in the District and should therefore be disregarded for plan-making purposes. The housing requirement in the Local Plan Review should address the imbalance in the population profile and support economic growth, which means a figure significantly in excess of locally assessed housing need.
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- Appendix B - Priority Junction Access Indicative Design
- Appendix C - Bell Lane/Foxhall Road/Site Access Roundabout Indicative Design
Introduction

1. Vectos is retained by Grainger to provide traffic and transport advice in relation to the potential development of Land East of Bell Lane, Kesgrave.

2. The proposals are for a residential led development of up to 1,300 units with supporting retail, education and community uses.

3. The site is currently being considered in the context of the emerging Suffolk Coastal District Council Local Plan, and has been identified as a potential development site in Issues and Options Report.

4. This Transport Strategy has been prepared to set out how the site would be developed and sustainable transport modes incorporated into the development. It also sets out how the impact of the development on the existing transport networks would be considered in detail and potential mitigation options that would ultimately be considered further as the Local Plan process moves forward.

Background

5. Whilst this report sets out the Transport Strategy for the proposed development, and is therefore not a Transport Assessment, it covers all of the issues raised in the National Planning Practice Guidance (NPPG) on preparing Transport Assessments to ensure that it is comprehensive.

6. The Transport Strategy for the site that has been developed is consistent with the national objectives that require new development to seek to reduce the demand for transport before looking at the wider impacts of vehicular traffic including the provision of infrastructure that minimises the need for travel to and from the site.

7. A balanced approach to car parking provision is also proposed within the Transport Strategy. This is to ensure that there are sufficient spaces available, but also to ensure that on-street parking which would adversely affect the operation of roads does not occur. The level of parking provision should also not encourage excessive car usage.

8. All of these issues are covered within the transport strategy to support the masterplan option that has been prepared for the site.

Site Location

9. The site is located to the south of Kesgrave, which is located to the east of Ipswich. The site is 15 ha and is made up largely of agricultural fields. The location of the site in a strategic and local context is presented in Figure 1 and Figure 2 respectively.

10. The northern boundary of the site adjoins a Public Right of Way (Bridleway), identified as the Sandlings Walk National Route (also known as ‘Long Strops’). Beyond this is residential development within Kesgrave itself, as well as the Cedarwood Primary School.

11. The eastern and southern boundaries of the site are defined by existing agricultural land. A former Radar Station and Aviation History Museum are located circa. 150m to the south.
Foxhall Road woodlands are located to the west, on the opposing side of Bell Lane. Foxhall Stadium is located within these woodlands.

12. To the west of the site Bell Lane is a single carriageway road which links Foxhall Road and the proposed site with the wider Kesgrave area to the north.

**Existing Local Facilities**

13. When considering the provision of existing local facilities, consideration has been given to those that are considered to be within walking and cycling distance, and that are accessible by public transport. This is consistent with both central and local government guidance as expressed through the National Planning Policy Framework (NPPF), NPPG and local transport plans and development plans, which seek to reduce the reliance on the private car for everyday journeys. The NPPF places particular importance on walking and cycling, although it is important to note that it does not consider either of these modes to be more preferable over the other. For a site to be considered sustainable in transport terms day to day facilities (shops, school, employment and community/health facilities) need to be accessible by walking, cycling or by public transport.

14. The local facilities plan provided at Appendix A illustrates the proximity of a number of key facilities that residents could make use of on a day-to-day basis. This also demonstrates how the majority of the facilities are within a 2 kilometre distance of the proposed site access. 2km is a comfortable walking distance for most people, whilst all of the facilities listed are considered to be within cycling distance of the site.

15. **Table 1** below sets out the distance and walking / cycling time to a number of the key existing facilities illustrated in the above plan.
Table 1: Local Facilities in Close Proximity to the Site

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Facility Name</th>
<th>Distance</th>
<th>Average Walking Time</th>
<th>Average Cycle Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail</td>
<td>'One-Stop' Community Stores, Kesgrave Pharmacy, Post Office Penzance Road</td>
<td>1.2km</td>
<td>15 mins</td>
<td>6 mins</td>
</tr>
<tr>
<td>Supermarket</td>
<td>Shops (Supermarket) Tesco, Twelve Acre Approach</td>
<td>1.7km</td>
<td>21-22 mins</td>
<td>10 mins</td>
</tr>
<tr>
<td>Retail</td>
<td>'One-Stop' takeaways, Tower Hall and Busy Bees Nursery, Broadlands Way</td>
<td>1.4km</td>
<td>17-18 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Post Office</td>
<td>Post Office, Main Road</td>
<td>2.5km</td>
<td>31 mins</td>
<td>6 mins</td>
</tr>
<tr>
<td>Public House</td>
<td>The Bell Inn Public House, Main Road</td>
<td>1.8km</td>
<td>22-23 mins</td>
<td>11 mins</td>
</tr>
<tr>
<td>Hotel</td>
<td>Golf Hotel</td>
<td>1.8km</td>
<td>22-23 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Church</td>
<td>All Saints Church</td>
<td>1.9km</td>
<td>23-24 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Church</td>
<td>Baptist Church</td>
<td>1.9km</td>
<td>23-24 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Leisure</td>
<td>Millennium Sports and pavilion</td>
<td>0.9km²</td>
<td>11 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Community Centre</td>
<td>Kesgrave Community Centre</td>
<td>1.0km</td>
<td>12-13 mins</td>
<td>4 mins</td>
</tr>
<tr>
<td>Stadium</td>
<td>Foxhall Stadium</td>
<td>1.0km</td>
<td>12-13 mins</td>
<td>5 mins</td>
</tr>
<tr>
<td>Library</td>
<td>Kesgrave Library</td>
<td>1.7km</td>
<td>21 mins</td>
<td>5 mins</td>
</tr>
<tr>
<td>Secondary School</td>
<td>Kesgrave High School including Youth Club, Main Road</td>
<td>2.2km</td>
<td>21-22 mins</td>
<td>8 mins</td>
</tr>
<tr>
<td>Leisure</td>
<td>Kesgrave Social Club</td>
<td>1.5km</td>
<td>18-19 mins</td>
<td>10 mins</td>
</tr>
<tr>
<td>Nursery</td>
<td>Tots Private Day Nursery</td>
<td>2.4km</td>
<td>30 mins</td>
<td>7 mins</td>
</tr>
<tr>
<td>Primary School</td>
<td>Cedarwood Primary School</td>
<td>0.9km²</td>
<td>11 mins</td>
<td>10 mins</td>
</tr>
<tr>
<td>Primary School</td>
<td>Heath Primary School</td>
<td>1.1km</td>
<td>13-14 mins</td>
<td>4 mins</td>
</tr>
<tr>
<td>Dentist</td>
<td>Suffolk Orthodontics, Bell Lane</td>
<td>0.6km</td>
<td>7-8 mins</td>
<td>5 mins</td>
</tr>
<tr>
<td>Hospital</td>
<td>Nuffield Hospital</td>
<td>1.5km</td>
<td>18-19 mins</td>
<td>3 mins</td>
</tr>
</tbody>
</table>

16. Routes to and from key facilities are set out in more detail below.

Education Facilities

17. There are three schools in the vicinity of the site which are consider to be within a reasonable walking distance:-

- Cedarwood Primary School is located 0.7km from the centre of site and is accessed via Long Strops Bridleway.
Heath Primary School is located 1.1km from the centre of the site. Heath Primary School is accessible via footpaths along Bell Lane. This provides a very direct walking route which has been estimated at roughly 13 minutes in duration.

Kesgrave High School is the only secondary school in the vicinity of the site and is located approximately 1.7km from the centre of the site. The most direct route to Kesgrave High School involves using the Long Strops Bridleway on to Catchpole Close and continuing north along Ropes Drive on to the A1214.

**Employment Opportunities**

18. Trip to and from work will form a key proportion of journeys undertaken at the site. Key employment areas have identified within reasonable commute times include Ipswich town centre, the area surrounding Ipswich Hospital and Martlesham Heath (Adastral Park).

19. Opportunities for travel towards these employment areas are summarised below.

**Ipswich Hospital**

20. The site is within an 11 minute cycle time of Ipswich Hospital. The terrain is mostly flat and involves a combination of cycling along National cycle route 1 and Rushmere Common (off-road).

21. Residents are also able to join the 66 bus service using a bus stop on Penzance Road. The journey time is approximately 23 mins.

**Ipswich Town Centre**

22. Residents are able to cycle towards the town centre using National Cycle route 1. Alternatively cyclist are also able to use the A1214 towards the town centre.

23. Public transport access is again provided by the 66 service from the bus stop on Penzance Road, north of the site, which provides a direct route towards the town centre. The journey time is approximately 38 mins.

**Martlesham Heath (Adastral Park)**

24. National Cycle Route 1 provides a cycle route Adastral Park. Whilst other routes are available the National Cycle Route 1 represents the most attractive route.

25. The 66 bus route, accessed from the bus stop on Penzance Road, travels towards Adastral Park. The journey time is approximately 35mins. The 66 bus service may also be accessed from Ropes Drive.

26. It should be noted that the distances and journey times mentioned assume bicycles/pedestrians will leave via the proposed vehicular access with Bell Lane or onto a single connection to Long Strops Bridleway. In reality the site is likely to have additional pedestrian and cycle access points which will reduce these journey times. Proposals for pedestrian, cycle and public transport improvements are discussed later in this report.

27. In addition to this and as set out below additional local facilities will be provided within the site including a local centre with retail, community and potentially health facilities.
Masterplan Proposals

28. The initial masterplan proposals for the site seek to provide a residential development of up to 1,300 units together with supporting retail, education and community uses. The masterplan layout indicates that retail uses would be provided in the centre of the site in a local centre. Whilst the exact make-up of this local centre is not known at this stage, it is considered that this could include a convenience store, take-away / café, and other small retail units for local businesses.

29. A primary school is proposed to the north of the site, which would not only serve future residents of the site but is also likely to serve existing local residents. Community facilities are also proposed adjacent to the primary school and this is likely to be in the form of a community hall for use by local groups. The site is also of sufficient quantum that it is likely to support services such as a GP surgery, subject to interest from potential operators.

30. The provision of these facilities on-site forms a key part of the sustainable transport strategy as it assists in reducing the need to travel off-site. The layout of the site will also promote walking and cycling as the main modes of travel within the site through the provision of a network of direct routes that give these modes of travel priority over car use. These walking and cycling routes will also link with existing routes to the north of the site. This is discussed further below.

Vehicular Access

31. Three potential vehicular access points in to the site are currently being considered. These are shown in Figure 3.

Access point 1 – Northern end of Bell Lane

32. This is a priority junction access with a ghost island right turn lane that was previously agreed with Suffolk County Council (SCC) as the local highway in relation to a previous proposal at the site. There is flexibility on the exact location of this access, but as a secondary access this is the appropriate form of junction. The indicative layout this junction is shown in drawing 162737/A/09 Rev A, provided at Appendix B.

Access point 2 – Junction of Bell Lane with Foxhall Road

33. The second access point makes use of a new roundabout to provide access to the site, adjacent to the current junction of Bell Lane with Foxhall Road. Provision of this junction allows the existing crossroads junction between Bell Lane and Foxhall Road to be removed and replaced by the roundabout. This is a roundabout and it assumes that the existing Bell Lane is diverted to achieve a suitable design. This design will be refined in due course, to ensure that the appropriate forward visibility splays are maintained. The proposed junction can be provided within land that forms either existing adopted highway or the site.

34. This proposal has been discussed and agreed in principle with SCC. This is likely to form the primary access to the site. The indicative layout this junction is shown in drawing 162737/A/10 Rev A, provided at Appendix C.
Access point 3 – Millennium way

35. There is also potential to access the site via Millennium Way, an existing residential road to the north that leads to Century Drive to Ropes Drive. This access point is considered suitable for use by a small number of dwellings only or as a bus access with sufficient controls to avoid the creation of a through route for general traffic. Restricting access to a small number of residential units and / or public transport vehicles will ensure that the number of vehicles using Millennium Way is kept to a manageable level.

Trip Generation Assessment

36. Using data within the Trip Rate Information Computer System (TRICS) database, the number of trips that could potentially be generate by the site has been estimated. TRICS is an industry standard database of traffic surveys at a large number of sites that allows the calculation of trip rates for a range of land uses including residential.

37. Based on trip rates extracted from the TRICS database, the potential traffic flows generated by the proposed development are set out in Table 2 below.

Table 2: Proposed Development Traffic Flows

<table>
<thead>
<tr>
<th></th>
<th>AM Peak (08:00-09:00)</th>
<th>PM Peak (17:00-18:00)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Rate per Dwelling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Arr</td>
<td>0.144</td>
<td>0.298</td>
</tr>
<tr>
<td>Dep</td>
<td>0.380</td>
<td>0.212</td>
</tr>
<tr>
<td>Two-Way</td>
<td>0.524</td>
<td>0.510</td>
</tr>
<tr>
<td>Total Trips- 1,300 Residential Units</td>
<td>187</td>
<td>387</td>
</tr>
<tr>
<td></td>
<td>494</td>
<td>276</td>
</tr>
<tr>
<td></td>
<td>681</td>
<td>663</td>
</tr>
<tr>
<td>Total Trips- 20% Reduction for Internalisation &amp; Modal Shift</td>
<td>150</td>
<td>310</td>
</tr>
<tr>
<td></td>
<td>395</td>
<td>221</td>
</tr>
<tr>
<td></td>
<td>545</td>
<td>530</td>
</tr>
</tbody>
</table>

38. Table 2 indicates that the development is estimated to generate between 500 and 550 two way trips during AM and PM peak periods. These trips are likely to use key routes including Bell Lane, Foxhall Road, the A1214 and A12 for journeys. Off-site highway implications arising from the development are considered further below.

Pedestrians and cyclists

Existing Conditions

39. On the northern perimeter of the site, Long Strops Bridleway acts as a pedestrian footpath which connects to the pedestrian network north of the site. There is also a footway located to the east of Bell Lane which is located on the western border of the site. South of Bell Lane at the junction with Foxhall Road there are dropped kerbs providing a pedestrian crossing which connects to a footway along the north of Foxhall Road. The footway is provided only to the west of the Bell Lane/Foxhall Road junction.

40. A footpath, crossing Foxhall Road south of the site extends south east of the site and crosses Bell Lane providing pedestrian access towards Foxhall Stadium.
41. The National Cycle Route 1 is approximately 1km north of the site and runs in an east-west direction. The National Cycle Route 1 provides a cycle route connecting Dover and the Shetland Islands - via the east coast of England and Scotland. There are also quiet cycle routes concentrated within the built up residential areas directly north and north-west of the site.

**Proposed Improvements**

42. The development will ensure that appropriate connections are made to Long Strops Bridleway to the north of the site. The procedure for this has been discussed in detail with SCC and will be considered further as the development of the site progresses. This would then provide walking/cycling routes to the majority of existing local facilities.

43. The existing footpath at the eastern end of the site that currently does not provide a through route could also be extended to connect to Long Strops Bridleway.

44. Consideration to improvements to existing off-site public rights of way in the vicinity of the site will be given as the development of the site progresses. It is likely that this would be in the form of financial contributions to SCC.

**Public transport**

**Local Bus Services**

45. Bus stop locations in the vicinity of the site are presented on the plan contained in Figure 4. There are three existing bus services available. The existing closest bus stop is located north of the site, along Ropes Drive approximately 1km from the centre of the site.

46. Further information on local bus services and frequencies is provided in Table 3 below.

**Table 3: Existing Local Bus Services**

<table>
<thead>
<tr>
<th>Service No.</th>
<th>Route</th>
<th>Average Frequency (mins)</th>
</tr>
</thead>
<tbody>
<tr>
<td>66</td>
<td>Ipswich - Martlesham Heath</td>
<td>Mon-Fri: Every 20 mins (am) Every 45mins (pm)</td>
</tr>
<tr>
<td>63</td>
<td>Ipswich – Melton (via fenton way)</td>
<td>Every 60 mins</td>
</tr>
<tr>
<td>63</td>
<td>Ipswich – Bixley (via Edmonton close)</td>
<td>Every 60 mins</td>
</tr>
<tr>
<td>4</td>
<td>Ipswich - Bixley</td>
<td>Every 30 mins</td>
</tr>
</tbody>
</table>

47. All the above bus services travel to Ipswich Railway Station.

**Potential Improvements**

48. As part of the development proposal, improved bus services at the site will be provided to ensure that public transport is a realistic option for travel for future residents of the site. At
this stage it is envisaged that this will take the form of an extension to a suitable existing bus service. The provision of a new bus service into the site will also be considered if this is appropriate. As part of the development of the masterplan, provision of bus services will be discussed and agreed with the County Council and local bus operators.

49. At this stage, it is considered that both routes 4 and 66 could be diverted into the site. Any bus service would seek to provide a route to key employment areas including Martlesham Heath, Ipswich Hospital and Ipswich Town Centre.

Local Rail Services

50. Derby Road Rail Station is located approximately 4.5 km west of the site. The station can be accessed by bicycle or via bus route 4, which stops on Felixstowe approximately 400m from the station.

51. Derby Road railway station is on the Felixstowe Branch Line, serving the Rose Hill area and the eastern side of Ipswich. The station provides services between Ipswich and Felixstowe.

52. Any bus services introduced at the site will seek to provide a link between the site and Derby Road Station.

Travel Plan

53. A Travel Plan will be prepared to encourage travel to the site by sustainable modes.

54. The primary objective of this Travel Plan will be to set out a long term strategy to facilitate and encourage modes of travel to the site by means other than the private car, which reflects current central and local government policy.

55. The strategy needs to be long term as changing travel habits takes time and will only occur through a combination of incentives, improved facilities, government initiatives and changes in individual attitudes.

56. The developer will appoint a Travel Plan Coordinator (TPC) to manage the Travel Plan as well as overseeing its development, implementation, monitoring and review. A number of targets will be set, based on reducing single occupancy vehicle trips to/from the site and encouraging the use of sustainable modes. In order to achieve these targets, a number of initiatives and measures will be implemented.

57. These will be a mixture of ‘hard’ and ‘soft’ measures. Hard measures include the provision of facilities such as safe and secure cycle parking, whilst soft measures include initiatives such as providing information on public transport services. This can be achieved through the provision of information as part of the ‘Welcome Pack’ given to new residents.

58. The Travel Plan will subsequently be monitored on an annual basis by the TPC, and a monitoring report will be provided to the County Council and any other relevant stakeholders. As part of each monitoring report, additional measures will be considered as required in order to further promote the use of sustainable travel modes.
59. The Travel Plan will be finalised and agreed prior to the occupation of the proposed development.

**Parking**

60. Car parking provision will be line with the adopted County Council standards.

61. Parking will be provided to ensure that it is well located to the houses that it serves to ensure that on-street parking does not occur to any significant degree. This means that access to all parts of the site will be maintained at all times for larger vehicles (refuse lorries and delivery vehicles) and for the emergency services.

62. This approach recognises the need to provide sufficient parking spaces to avoid parking that would adversely affect the operation of surrounding streets, but not providing parking to a level that would encourage car usage. This is a balanced approach that is consistent with local and national planning policies.

**Off-Site Highway Issues**

63. A detailed assessment of the implications of development traffic on the local highway network will be undertaken as the development of the site progresses, and this will included detailed capacity analysis of junction operation. At this stage, key junctions that are likely to form part of this exercise are identified in Figure 5.

64. The Bell Lane / Foxhall Lane junction is a key existing junction where SCC has concerns over the current layout. As set out above, as part of the provision of access to the site, this junction will be replaced by the proposed roundabout.

65. Junctions on Foxhall Lane and the A1214 will also be considered as well as the A12 corridor. At this stage, key junctions are considered to be:

- A1214 / Bell Lane Signal Controlled Junction- there is an opportunity to review the existing layout and signal controller to understand whether additional capacity or improved infrastructure can be provided that would improve the operation of the junction.
- Foxhall Lane / A1189 Roundabout- there is potential to review the layout of this junction and consider whether upgrading to traffic signals may improve operation and pedestrian / cycle connectivity.
- A12 / Foxhall Lane- there may be an opportunity provide additional capacity at key approaches or consider partial signalisation, although it is understood that the current proposals at Adastral Park are considering improvements to the A12 corridor.

66. Any junction improvements required will need to be considered in the context of existing constraints, but there are no identified reasons as to why any improvements needed to mitigate the implications of the development of the site cannot be implemented.
Planning Obligations

67. A future planning application for the development of the site will identify any transport mitigation measures associated with the development of the masterplan proposals. There will be a package of measures to encourage the use of non-car modes of transport and to manage the demand for transport, which will incorporate the measures outlined above.

Summary

68. The transport strategy set out above shows how the proposed site would be developed for a residential development of up to 1,300 units. It identifies how the site would be accessed by all modes of transport to ensure that the demand for transport is minimised and where mitigation measures may be required how they could be provided.

69. More detailed work will be undertaken as the Local Plan process moves forward, but based on the work that has been undertaken to date it has been demonstrated that where needed, mitigation measures could be identified and provided.

70. In conclusion, the provision of up to 1,300 units on the site could be implemented with a supporting Transport Strategy and there are no highways and transport related reasons why the site should not be allocated within the emerging Neighbourhood Plan.
Site Location Plan (local context)

Grainger

Site Location

Bell Lane, Kesgrave

Figure 1

Site Location Plan (local context)

Drawn:  
Checked:  
Date:  
Scales:  

Network Building, 97 Tottenham Court Road, London W1T 4TP  
Tel: 020 7580 7373  
Email: london@vectos.co.uk  
www.vectos.co.uk
Site Location Plan (strategic context)

Figure 2

Bell Lane, Kesgrave

Grainger

Site Location

Key:

Network Building, 97 Tottenham Court Road, London W1T 4TP
Tel: 020 7580 7373 Email: london@vectos.co.uk  www.vectos.co.uk
Site Access Locations

Key:
- Site
- Possible site access location

Bell Lane, Kesgrave

Grainger

Figure 3
Key:
- Bus stop location
- 4 service bus route
- 66 service bus route

Bell Lane, Kesgrave

Grainger

Bus Route Plan

Figure 4
APPENDIX A

Existing Local Facilities
APPENDIX B

Priority Junction Access Indicative Design
Existing location of change in speed limit.

2.4m x 140m Visibility Splay

2.4m x 215m Visibility Splay

Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.
2. White lining is indicative only.

- Highway maintainable at public expense

Grainger Plc

Bell Lane, Kesgrave

Proposed Development Access

1:1250 at A3

Network Building, 97 Tottenham Court Road, London W1T 4TP

t: 020 7580 7373 e: enquiries@vectos.co.uk
APPENDIX C

Bell Lane/Foxhall Road/Site Access Roundabout Indicative Design
This is not a construction drawing and is intended for illustrative purposes only.
White lining is indicative only.

Notes:

- Highway maintainable at public expense

DRAFT
FOR INFORMATION ONLY

1. Highway boundary added.
2. ID 16.10.2017

DRAWING NUMBER:

SCALES:

DRAWN:

CHECKED:

REV.

DATE:

DRAWING TITLE:

PROJECT:

CLIENT:

Notes:

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transport planning specialists
Network Building, 97 Tottenham Court Road, London W1T 4TP
t: 020 7580 7373 e: enquiries@vectos.co.uk

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Bell Lane, Kesgrave

Southern Roundabout Access

Scales:

1:1000 at A3

DRAWN:

CHECKED:

DATE:

26.09.2017
Contents

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Section 2 Landscape Related Designations and Policy ............................................................................. 3
Section 3 Landscape Character and Visual Considerations ........................................................................ 5
Section 4 Summary of Findings and Conclusions ...................................................................................... 11

Appendix

Appendix EDP 1 Photographic Plates Illustrating Landscape Context

Plans

Plan EDP 1 Site Location and Boundaries
(EDP4392/02a 27 October 2017 OK/CJM)

Plan EDP 2 Environmental Planning Context
(EDP4392/03a 27 October 2017 OK/CJM)

Plan EDP 3 Topography Plan
(EDP4392/06a 27 October 2017 WG/CJM)

Plan EDP 4 Aerial Photograph and Proposed Viewpoint Locations
(EDP4392/01a 27 October 2017 OK/CJM)

Plan EDP 5 Preliminary Opportunities and Constraints
(EDP4392/05a 27 October 2017 CJM/WG)

This version is intended for electronic viewing only

For EDP use

Report no. L_EDP4392_01a
Author Will Gardner
Peer Review Charles Mylchreest
Formatted Emma Read
Proofed Laura Lloyd
Proof Date 26 October 2017
Section 1
Introduction

1.1 Grainger Plc has appointed the Environmental Dimension Partnership Ltd (EDP) to undertake a preliminary landscape appraisal of potential development of land at Kesgrave (hereafter referred to as ‘the site’). The location and boundaries of the site are illustrated on Plan EDP 1.

1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The practice operates throughout the UK from offices in Cirencester, Shrewsbury and Cardiff. Details of the practice can be obtained at www.edp-uk.co.uk.

Context and Purpose

1.3 The site is currently being promoted as a sustainable location for an additional community on the edge of Kesgrave. The purpose of EDP’s work is to deepen the understanding of the current environmental issues that may affect the site’s development capacity and/or layout. To this end, a landscape desk study and initial assessment of the site’s landscape character and visual envelope has been undertaken, with the findings presented below.

1.4 The following appendices and plans are provided within this report, which should be referred to alongside the text:

- Appendix EDP 1 provides photographic plates illustrating the landscape context;
- Plan EDP 1 illustrates the site’s location and boundaries;
- Plan EDP 2 illustrates the site’s environmental planning context;
- Plan EDP 3 illustrates the site’s topographic context;
- Plan EDP 4 is an aerial photograph of the site illustrating its current character and local context; and
- Plan EDP 5 summarises the site’s landscape and visual constraints and opportunities.
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Section 2
Landscape Related Designations and Policy

Landscape Related Designations

2.1 As illustrated on Plan EDP 2, the site does not fall within or contain a national landscape designation. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) lies to the east of the site, beyond the A12. The AONB is protected by statutory government policy as an area of national importance. As discussed below, and considering the nature of the proposed development, there is no potential for impact on views into or out of this landscape, nor is there any potential for the development of the site to reduce any perception of tranquillity or scenic quality within the AONB (i.e. indirect effects).

2.2 To the south of the site the landscape is designated at the local level as a Special Landscape Area (SLA). To the west the Foxhall Road, woodlands are protected at the local level under Local Plan saved Policy AP225.

2.3 Collectively, the area surrounding the site contains a number of nationally and locally designated ecological and heritage assets, which permeate the wider countryside. The site is not exceptional in this regard. At the local level, one public right of way (PRoW) (E-254/045/0) passes through the site.

Landscape Related Policy

2.4 Local policies are set out in the Core Strategy and Development Management Policies DPD (July 2013), which forms part of the Local Plan. As discussed above and illustrated on Plan EDP 2, the site itself is not subject to any landscape designations; there are however areas protected under local policy within close proximity. To the south of the site, beyond Foxhall Road the landscape is designated as an SLA, with this extending from Martlesham Heath to the eastern edge of Ipswich. Under Policy AP 13 the council require that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality of SLAs.

2.5 Furthermore, these are inter alia supported by aspects within Policy AP 225 (Ipswich Fringe: Foxhall Road Woodlands), which recognise woodlands fringing Foxhall Road. As illustrated on Plan EDP 2, this area of woodland is dissected by numerous PRoW. Policy AP 225 states:

“planning permission will not be granted for development proposals which would neither protect or enhance the character of the woodland and heathland north and south of Foxhall Road.”
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Section 3
Landscape Character and Visual Considerations

Background

3.1 Published sources describing the landscape character of, and around, the site are available at national and county/district levels as follows:

- The Character Map of England (Countryside Character), Countryside Agency, 1999; and
- Suffolk Landscape Character Assessment, 2011.

National Character

3.2 The site falls within Natural England’s National Character Area (NCA) No 82 ‘Suffolk Coast and Heaths’. The key characteristics of this NCA, of relevance to the site, are:

- “A predominantly low lying landscape with some areas along the coastal plain below or at sea level;
- Views across the dry farmland and heathlands are open and extensive, except where enclosed by woodland;
- Farm woodlands, plantations and field boundary trees provide a treed character with substantial coniferous forests; and
- Larger urban settlements are confined to the north and south.”

Local Landscape Character

3.3 Suffolk’s Landscape Character Assessment provides the baseline evaluation of landscape character across the county. The site and landscape surrounding Kesgrave is identified as being within the gently rising land of the ‘Estate Sandlands Landscape Character Type (LCT)’, which comprises the ‘host’ landscape type that might potentially be affected by any potential future development.

3.4 The overall description of the LCT is as follows

“This is a relatively simple landscape comprising extensive areas of conifer plantations, arable land and some remnant heaths, reflecting the underlying sandy soils. Scots Pine shelterbelts and ‘pine lines’ are defining characteristics.”
The key characteristics of the Estate Sandlands LCT relevant to the site and surrounding area can be summarised as follows:

1. Flat or gently rolling plateau;
2. Large continuous blocks of commercial forestry;
3. Widespread planting of tree belts and rectilinear plantations including characteristic pine lines;
4. Relatively late, estate type, red brick buildings with pan-tiled roofs; and
5. Fields enclosed by hedges of Hawthorn and elm.

**EDP Site Character and Visual Assessment**

A walk-over survey of the site was undertaken in September 2017 from the PRoW, and the photographs at Appendix EDP 1 illustrate its context and character. The character of the site and its immediate surroundings are generally consistent with published assessments, as outlined above.

The site boundaries are shown on Plan EDP 1; its designatory status and that of the surrounding area is shown on Plan EDP 2. An aerial photograph is included as Plan EDP 4, which helps illustrate the character of the local area.

The site is located adjacent to the settlement edge of Kesgrave, and extends in total to approximately 57 hectares (ha). The predominant land use is arable farming (Plate EDP 1), although there are small pockets and linear belts of trees and woodland such as Long Strops. The site also contains the Suffolk Aviation Heritage Museum which forms a distinct focal point in views (Plate EDP 4). The site’s northern boundary is defined by Sandlings Walk promoted PRoW. The eastern boundary is formed by woodland adjacent to Dobbs Lane, Bell Lane forms the western boundary, and the southern boundary is formed by open agricultural land, the Suffolk Aviation Heritage Museum and Foxhall Road.

The topographical context of the site is illustrated on Plan EDP 3. The site’s high point at the northern boundary is approximately 35m above Ordnance Datum (aOD), from which point it slopes gently to the south-west and north-east to 28m aOD. The land broadly comprises four agricultural fields, although there is little discernible subdivision on site.

While the site may fall into the ‘open countryside’ for planning purposes, its surrounding land use and visual character means it is not part of the more functionally intact agricultural landscape further to the south (Foxhall). The site is separated from the wider agricultural landscape by settlement to the north and extensive woodland areas to the south, east and west (Plate EDP 3 and 4).
3.11 As shown on Plan EDP 4 and Plate EDP 3, the site lies on the fringe of Kesgrave, which exerts an urbanising influence on the site by virtue of: (a) Modern development to the north (although many parts are well screened by vegetation alongside Sandlings Walk) (Plate EDP 5); (b) relatively unsympathetic vernacular and material use in modern adjoining residential areas (Plate EDP 3); and (c) Intensive 20th Century agricultural activity and alteration of field patterns. (Plates EDP 1 and 2).

Discussion and Opinion: Appropriateness of Development in Landscape Terms

3.12 The appropriateness of the site for development purposes may be considered in the following important respects, discussed in turn below:

- The intrinsic ‘value’ of the site and local landscape;
- Likely visual effects where the site is to be developed;
- Its spatial and topographical appropriateness; and
- Any particular on-site constraints that may limit development capacity or layout.

The Site’s Intrinsic Value

3.13 The Framework advises that development should, wherever possible, be directed to land of the least environmental value (paragraph 17). As such, the intrinsic value of the site is central to its appropriateness for development.

3.14 EDP has undertaken a review of the site’s intrinsic value using a well-established/accepted approach based on GLVIA\(^1\). The concept of ‘landscape’ embraces much more than its openness and appearance. The European Landscape Convention (ELC), to which the UK is a signatory, defines landscape thus:

“Landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”.

3.15 The GLVIA paragraph 2.4 reminds us that the importance of the ELC definition is that it:

“...moves beyond the idea that landscape is only a matter of aesthetics and visual amenity”.

3.16 The GLVIA Third Edition assists greatly in delivering a framework for an objective landscape assessment of value. In particular, Box 5.1 on page 84 of GLVIA identifies eight criteria relevant to judgements about landscape value, insofar as they inform this as part of the wider consideration of defining overall sensitivity.

EDP have considered these criteria in the round, and summarised that the site is an ‘ordinary to poor’ example of its type. Moreover, there exists, to the best of our knowledge, no circumstantial evidence to suggest that the community attaches weight to the site (it is not identified in any Neighbourhood Plan, has not been the subject of an Asset of Community Value (ACV) or Local Green Space (LGS) application, for example).

**Predicted Visual Effects**

3.18 Whilst a full Landscape and Visual Assessment/Appraisal will be undertaken for any proposed development in due course, for the purposes of this initial appraisal a Zone of Theoretical Visibility (ZTV) has been developed to show the theoretical visibility of the proposed development (i.e. an absolute worst-case). This ZTV assumes dwellings at 12m in height from the proposed development parcels identified in the promotional material (again, this represents a worst-case scenario).

3.19 The ZTV indicates the potential for visibility beyond the settlement to the north and over woodland blocks to the east and west. Views to the south and west are likely to be constrained by built form and woodland.

3.20 In reality, and as informed by the site walkover, the Zone of Primary Visibility (ZPV), i.e. where the development might form a noticeable portion of the view, will be limited to the following:

- Local public footpaths within, adjacent or in close proximity to the site;
- The surrounding minor road network; and
- Some residential receptors along the northern boundary.

3.21 Specifically, changes are predicted at the following locations:

- Foxhall Road to the south;
- Bell Lane to the west;
- Sandlings Walk and the adjacent settlement edge to the north; and
- Limited sections of Dobbs Lane to the east where vegetation allows.

3.22 In essence, beyond the site’s immediate context, intervisibilty is limited by:

- Residential development north of Sandlings Walk;
- Extensive Woodland to the west of Bell Lane; and
- Extensive Woodland (Brookhill Wood) to the south of Foxhall RoadBell Lane.
3.23 Parts of the eastern boundary are more open, allowing for glimpsed views from the road and PRoW users to the south-east and along short sections of Dobbs Lane. Beyond these locations there are no potential views from sensitive landscape such as the AONB.

3.24 Assuming the site is developed in the manner illustrated on Plan EDP 5, visual change is predicted to be geographically very limited. It should be noted that it is not necessary (or appropriate) to hide new development in this (or any) landscape context; built development (including housing) is already an established and frequent component of the visual character of the area, so new development will not be inappropriate, unexpected or discordant in this context.

3.25 Based on fieldwork observations and the findings of the data trawl, a selection of locations intended to represent the variety of views available from public vantage points towards the study area are presented on Plan EDP 4. It is proposed that these viewpoints would be used to inform the masterplanning process and that a full assessment of the effects on each viewpoint is undertaken within a full LVIA.

On-site Constraints and Opportunities

3.26 Landscape and visual related opportunities and constraints are shown on Plan EDP 5, and described in more detail below.

3.27 As discussed previously, the site is relatively unconstrained in visual terms. There will, however, be a number of residential receptors along the northern boundary which might be afforded open views of the site and which should be considered in future masterplanning.

3.28 Development of the site should retain the mature landscape fabric where possible, as this contributes to the physical containment and landscape characteristics.

3.29 The following opportunities should be considered when developing the masterplan:

- A green infrastructure framework to integrate with the existing landscape and provide visual amenity with biodiversity enhancement, whilst ensuring greater permeability from the site to the wider countryside;

- Create a positive contribution to the urban and rural context at the southern edge of Kesgrave through the creation of strong Green Infrastructure (GI) corridors to contain and compartmentalise development;

- Provide ecological enhancements to create an overall net gain in biodiversity and including:
  - Retention and enrichment, through clearing out and gapping up, of the existing hedges;
  - Establishment of new native hedges;
• New tree planting to provide new foraging, refuge, roosting and nesting opportunities for birds and bats in particular; and

• Creation of naturalistic open space in visually sensitive locations with species enriched grassland and native trees and shrubs to provide commuting routes and foraging areas for animal species.

• Creation of SuDS features forming part of the drainage strategy landscaped to provide recreational, visual and ecological benefit; and

• Provision for children’s play, integrated with other landscape and ecology features, providing for ‘natural play’ and with timber elements in keeping with its informal setting and location at the settlement edge.
Section 4
Summary of Findings and Conclusions

4.1 The findings of EDP’s assessment is set out in more detail in the preceding sections of this report. However, the key findings can be summarised as follows:

- Our overall conclusion is that the site is well suited to accommodate development to help meet the region’s housing need and is capable of being developed in accordance with relevant environmental policy at local and national levels; and
- EDP has not found any ‘in principle’ landscape or visual constraints that would preclude the site’s allocation for built development.

4.2 The key findings in respect of landscape and visual matters can be summarised as follows:

- The site is not, nor has it ever been, designated for its landscape or scenic qualities;
- It is relatively unexceptional in terms of landscape fabric and visual amenity and is not especially representative of its host landscape type;
- EDP’s assessment of landscape value (using GLVIA criteria) concludes that there is no basis on which to accord the site any more intrinsic value than all other open countryside within this landscape type;
- Development would not change the existing landform or landscape pattern, nor is it likely to alter the landscape character materially. It could offer greater public access to the surrounding countryside and a local non-designated heritage asset; and
- Development could safeguard the countryside by locating development where it would not be visually intrusive. Additionally, through sensitive urban design, the site has potential to provide an extensive green infrastructure network for the existing and new community.
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Appendix EDP 1
Photographic Plates Illustrating Landscape Context

Plate EDP 1: Illustrating current arable land use.

Plate EDP 2: Illustrating woodland blocks, which contains the site.
Plate EDP 3: Illustrating Kesgrave Fringe to the north of the site.

Plate EDP 4: Illustrating woodland blocks which contain the site on three aspects and the focal point of Suffolk Aviation Heritage Museum.
Plate EDP 5: Illustrating the character of Sandlings Walk to the north of the site.
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Plans

**Plan EDP 1**  Site Location and Boundaries  
(EDP4392/02a 27 October 2017 OK/CJM)

**Plan EDP 2**  Environmental Planning Context  
(EDP4392/03a 27 October 2017 OK/CJM)

**Plan EDP 3**  Topography Plan  
(EDP4392/06a 27 October 2017 WG/CJM)

**Plan EDP 4**  Aerial Photograph and Proposed Viewpoint Locations  
(EDP4392/01a 27 October 2017 OK/CJM)

**Plan EDP 5**  Preliminary Opportunities and Constraints  
(EDP4392/05a 27 October 2017 CJM/WG)
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Some potential views available through breaks in surrounding vegetation, although due to additional vegetation in the surrounding landscape, not likely to be extensive.

Views from the north-west possible, but likely to be screened by intervening settlement form.

Views from the west possible, but likely to be screened by intervening settlement form.

Views immediately adjacent to the site boundary, from the extensive network of Public Rights of Way will require management.

Public right of way through the site will require careful incorporation into the scheme.

Mature woodland on site boundaries provides excellent opportunity for instant high quality development, with wooded character.

Considerable changes likely from here, to be managed by buffering and design.

Views from neighboring residential areas, and from Sandlings Walk Long Distance Walking Route.
Issues and Options Sites 142, 485, 522 and 870

Landscape Briefing Paper

Prepared by: The Environmental Dimension Partnership Ltd

On behalf of Grainger Plc

October 2017 Report Reference EDP4392_02
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Plans

Plan EDP 1  Site Locations and Boundaries
            (EDP4392/07 30 October 2017 WG/CJM)

Plan EDP 2  Environmental Planning Context
            (EDP4392/08 30 October 2017 WG/CJM)

Plan EDP 3  Topography Plan
            (EDP4392/09 30 October 2017 WG/CJM)

This version is intended for electronic viewing only

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Section 1
Introduction

1.1 Grainger Plc has appointed the Environmental Dimension Partnership Ltd (EDP) to undertake a preliminary landscape appraisal of potential development of Issues and Options Sites 142, 485, 522 and 870. The location and boundaries of the site are illustrated on Plan EDP 1.

1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The practice operates throughout the UK from offices in Cirencester, Shrewsbury and Cardiff. Details of the practice can be obtained at www.edp-uk.co.uk.

Context and Purpose

1.3 Sites 142, 485, 522 and 870 are currently being promoted as sustainable locations for additional communities within Suffolk Coastal District. The purpose of EDP’s work is to deepen the understanding of the current environmental issues that may affect each site’s development capacity and/or layout. To this end, a landscape desk study and initial assessment of each site’s landscape character and visual envelope has been undertaken, with the findings presented below.

1.4 The following appendices and plans are provided within this report, which should be referred to alongside the text:

- **Plan EDP 1** illustrates each site’s location and boundaries;
- **Plan EDP 2** illustrates each site’s environmental planning context;
- **Plan EDP 3** illustrates each site’s topographic context;
- **Figures EDP 2.1 to 2.2** illustrating the presence of Tree Preservation Orders (TPO) on and adjacent to a number of the sites; and
- **Figures EDP 3.1 to 3.4** present an aerial photograph for each site, illustrating the current landscape character.
Section 2

Landscape Related Designations and Policy

Landscape Related Designations

2.1 As illustrated on Plan EDP 2, none of the sites fall within or contain a national landscape designation. The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) lies to the east and south of all the sites. The AONB is protected by statutory government policy as an area of national importance. As discussed below, and considering the nature of the proposed development, there is potential for impacts on views into and out of this landscape in relation to sites 142 and 485 which fall within the setting of the designation. Furthermore, there is the potential for the development of these sites to reduce the perception of tranquillity and/or scenic quality within the AONB (i.e. indirect effects).

2.2 Sites 142 and 870 do not contain any local landscape designations. To the north of 485 the landscape is designated at the local level as a Special Landscape Area (SLA). Parts of Site 522 fall within a SLA and, are protected at the local level under Local Plan saved Policy AP225.

2.3 Collectively, the area surrounding the sites contains a number of nationally and locally designated ecological and heritage assets, which permeate the wider countryside. None of the site are exceptional in this regard. Part of Site 870 is designated as a SSSI. At the local level:

- A single public right of way (PRoW) (E-388/039/A) transects Site 142, which also forms part of Sandlings Walk Promoted Route. Furthermore, the site’s northern and south-western boundary is defined by PRoW (E-388/038/X and E-388/040/0);

- Site 485 is crossed by PRoW E-254/031/0 which also forms sections of the southern boundary;

- Site 522 is crossed by 9 PRoW (E-254/005/0, E-254/009/0, E-254/010/0, E-254/012/0, E-254/013/0, E-254/040/0, E-254/041/0, E-254/042/0 and E-254/045/0). The northern boundary is also defined by Sandlings Walk Promoted Route;

- Site 870 is crossed by 4 PRoW (E-431/011/0, E-431/016/0, E-431/018/0 and E-456/022/0). Parts of the northern and south-western boundaries are formed by PRoW E-456/021/0 and E-456/023/0; and

- A number of tree and tree groups within and adjacent to sites 522 and 870 are subject to Tree Preservation Orders (TPO) as illustrated in Figure EDP 2.1 and 2.2 below.
Figure EDP 2.1: Illustrating TPO’s within and adjacent to Site 522

Figure EDP 2.2 Illustrating TPO’s within and adjacent to Site 870.
Landscape Related Policy

2.4 Local policies are set out in the Core Strategy and Development Management Policies DPD (July 2013), which forms part of the Local Plan. As discussed above and illustrated on Plan EDP 2, parts of Site 522 are subject to SLA designations. Furthermore, there are areas protected under local policy to the north of Site 485. This SLA designation extends from Martlesham Heath to the eastern edge of Ipswich. Under Policy AP 13 the council require that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality of SLAs.

2.5 Furthermore, these are inter alia supported by aspects within Policy AP 225 (Ipswich Fringe: Foxhall Road Woodlands), which recognise woodlands fringing Foxhall Road. As illustrated on Plan EDP 2, this area of woodland is dissected by numerous PRoW. Policy AP 225 states:

“planning permission will not be granted for development proposals which would neither protect or enhance the character of the woodland and heathland north and south of Foxhall Road.”

2.6 There is a potential conflict between this local designation and development in particular of Site 522.

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Section 3
Landscape Character and Visual Considerations

Background

3.1 Published sources describing the landscape character of, and around, the site are available at national and county/district levels as follows:

- The Character Map of England (Countryside Character), Countryside Agency, 1999; and
- Suffolk Landscape Character Assessment, 2011.

National Character

3.2 The sites fall within Natural England’s National Character Area (NCA) No 82 ‘Suffolk Coast and Heaths’. The key characteristics of this NCA, of relevance to the sites, are:

- “A predominantly low lying landscape with some areas along the coastal plain below or at sea level;
- Views across the dry farmland and heathlands are open and extensive, except where enclosed by woodland;
- Farm woodlands, plantations and field boundary trees provide a treed character with substantial coniferous forests; and
- Larger urban settlements are confined to the north and south.”

Local Landscape Character

3.3 Suffolk’s Landscape Character Assessment provides the baseline evaluation of landscape character across the county. All the sites are identified as being within the gently rising land of the ‘Estate Sandlands Landscape Character Type (LCT)’, which comprises the ‘host’ landscape type that might potentially be affected by any potential future development. Northern parts of Site 870 are also within ‘Ancient Rolling Farmlands’. Sections of Site 485 are within the ‘Plateau Estate Farmlands’.

3.4 The overall description of the Estate Sandlands LCT which is a consideration for all sites is as follows
“This is a relatively simple landscape comprising extensive areas of conifer plantations, arable land and some remnant heaths, reflecting the underlying sandy soils. Scots Pine shelterbelts and 'pine lines' are defining characteristics.”

3.5 The key characteristics of the Estate Sandlands LCT relevant to the sites and surrounding areas can be summarised as follows:

1. Flat or gently rolling plateau;
2. Large continuous blocks of commercial forestry;
3. Widespread planting of tree belts and rectilinear plantations including characteristic pine lines;
4. Relatively late, estate type, red brick buildings with pan-tiled roofs; and
5. Fields enclosed by hedges of Hawthorn and elm.

3.6 The overall description of the Ancient Rolling Farmlands LCT which is a consideration for the northern 2 field parcels of Site 870 is as follows

“Although there are some areas of extensive field amalgamation, overall the landscape is largely intact, and accessible through a dense network of winding roads with wide verges. In some places there are significant areas of development pressure and land use change, for example through commercial activities, and by the creation of pony paddocks. These are especially noticeable adjacent to the A12, A14 and on the outskirts of Ipswich and Sudbury. In these areas the rural agricultural character of the landscape is clearly diluted. In both parcels of this landscape, but especially in the eastern part, the high-tension overhead power lines and pylons are a note of discord in the landscape...”

3.7 The key characteristics of the Ancient Rolling Farmlands LCT relevant to the portion of Site 870 and surrounding areas can be summarised as follows:

1. Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees.

3.8 The overall description of the Plateau Estate Farmlands LCT which is a consideration for the northern 3 field parcels of Site 485 is as follows

“The eastern parts of this landscape suffer considerable localised effects from the A14 and A12 trunk roads, while in the wider landscape hedges tend to have a lot of suckering elm and be in poor condition.

In general the picture in the west is more mixed with considerable growth of villages simplifying the landscape locally. However, the overall pattern of large fields with hedges and woodland coverts remains apparent though some of the detail has been lost through
20th century agricultural improvements, and through the construction and redevelopment of airfields at Rougham, Ipswich and Bentwaters.”

3.9 The key characteristics of the Plateau Estate Farmlands LCT relevant to Site 485 and surrounding areas can be summarised as follows:

1. Flat landscape;
2. Large rectilinear field pattern;
3. Network of tree belts;
4. Large areas of enclosed former heathland; and
5. Relatively late, estate type, red brick buildings with pan-tiled roofs.

EDP Site Character and Visual Assessment

3.10 A drive-by survey of the sites was undertaken in September 2017. The character of the sites and their immediate surroundings are generally consistent with published assessments, as outlined above.

3.11 The sites boundaries are shown on Plan EDP 1; their designatory status and that of the surrounding area is shown on Plan EDP 2. An aerial photograph for each site is included below as Figure EDP 3.1 to 3.4, which helps illustrate the character of the local area.

Site 142

3.12 The site is located to the south of Martlesham beyond some agricultural fields and adjacent to the north-eastern settlement edge of Martlesham Heath, and extends in total to approximately 50 hectares (ha). The predominant land use is conifer and broadleaved woodland (Figure EDP 3.1), although mostly conifer plantation of c.30 years in age there are small pockets and linear belts of more historic broadleaved trees and woodland such the area in the south-east corner adjacent to Newbourn Road. The site’s northern boundary is defined by a short section of Waldringfield Road and a local PRoW. The eastern boundary is formed by Waldringfield Road / Newbourne Road, Felixstowe Road forms the western boundary, and the southern boundary is formed by recent residential development, open agricultural land and Moon and Sixpence Holiday Park. The site is to the immediate west of the Suffolk Coast & Heaths AONB and therefore falls within its setting.

3.13 The topographical context of the site is illustrated on Plan EDP 3. The site’s high point at the northern boundary is approximately 32m above Ordnance Datum (aOD), from which point it slopes gently to the south and south-east to 22m aOD.
3.14 The site is separated from the existing settlement edge by agricultural land, furthermore the extensive woodland character of the site creates a sense of tranquillity, development of the site would likely result in the urbanisation and disruption of amenity within the AONB in adjoining areas to the east.

![Figure EDP 3.1 Illustrating the character of Site 142 and the local area.](image)

Site 485

3.15 The site is located to the east of Ipswitch, beyond some agricultural fields and the Suffolk Showground in close proximity to Bucklesham (c.250m), which is location further east. The site extends in total to approximately 140 hectares (ha). The predominant land use is arable farmland (Figure EDP 3.2), although there are small pockets and linear belts of historic broadleaved trees. The site is split into two areas by the Bucklesham Road. The site’s northern boundary is defined by Purdis Road. The eastern boundary is formed by the A12, the A14 forms the southern boundary. To the west is open agricultural land. The site is to the immediate north of the Suffolk Coast & Heaths AONB and therefore falls within its setting.

3.16 The topographical context of the site is illustrated on Plan EDP 3. The site’s high point at the western boundary is approximately 33m above Ordnance Datum (aOD), from which point it slopes gently to the east to 23m aOD.

3.17 The site is currently divorced from the existing settlement edge by agricultural land and small scale development. Furthermore, development of the site would likely result in the introduction of extensive built form from viewpoints to the east and south-east (including
locations within the AONB) and could be perceived as an erosion of the separation between Ipswich and smaller settlements such as Bucklesham to the east.

Figure EDP 3.1 Illustrating the character of Site 485 and the local area.

**Site 522**

3.18 The site is located to the immediate south of Kesgrave, and extends in total to approximately 32 hectares (ha). The predominant land use is recreational woodland and Foxhill Stock Car Racing Stadium. Woodland cover is a mixture of broadleaved and conifer with lower areas of predominantly shrub coverage (Figure EDP 3.3). Many of the more historic areas of woodland are protected by Tree Preservation Orders as discussed in Section 2. The site’s northern boundary is defined by local PRoW and promoted route of Sandlings Walk. The eastern boundary is formed by Bell Lane, further woodland extends beyond the southern and eastern boundary. The site contains an extensive PRoW network which indicates a high recreational value, furthermore, due to the wooded character of the site, there is a distinct sense of separation between the site and the existing settlement edge of Kesgrave.

3.19 The topographical context of the site is illustrated on Plan EDP 3. The site’s high point at the centre and south east portion is approximately 35m above Ordnance Datum (aOD), from which point it slopes gently in all direction to a low point along the western boundary 24m aOD.

3.20 The site is separated from the existing settlement edge by woodland, much of which is subject to preservation orders. Furthermore the extensive woodland character of the site
creates a sense of tranquillity which development of the site would likely interrupt. Parts of the site are also designated as SLA as discussed in Section 2.

![Figure EDP 3.3 Illustrating the character of Site 522 and the local area.](image)

**Site 870**

3.21 The site is located to the immediate north of Kesgrave, and extends in total to approximately 130 hectares (ha). The predominant land use is agricultural with landscape fabric being mostly limited to field boundaries. There are pockets of woodland and higher value landscape fabric toward the east of the site in proximity to Sinks Valley Site of Special Scientific Interest (SSSI) (Figure EDP 3.4). Many of the more historic trees/woodland pockets are protected by Tree Preservation Orders as discussed in Section 2. The site’s northern boundary is defined by Playford Road and open agricultural land. The eastern boundary is formed woodland and some piecemeal development extending from Little Bealings. To the south and west is the existing settlement edge of Kesgrave. The site forms the head of a localised valley which extends into the River Fynn Valley further to the east. Due to topography and vegetation the character of much of the eastern portions of the site is little influenced by the existing settlement edge. Furthermore, the site currently provides a sense of separation between Kesgrave and the smaller settlement of Little Bealings to the north-east.

3.22 The topographical context of the site is illustrated on Plan EDP 3. The site’s high point at the western boundary is approximately 40m above Ordnance Datum (aOD), from which point it slopes markedly into a localised valley to a low point along the eastern boundary 21m aOD.
3.23 As discussed above, much of the site is separated from the existing settlement edge by topography and trees/woodland, many of which are subject to preservation orders. Furthermore the eastern portion of the site retains a more rural character which when coupled with the locality of the SSSI is a key consideration for any development of the site.

**Figure EDP 3.4** Illustrating the character of Site 870 and the local area.
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## Plans

**Plan EDP 1**  
Site Locations and Boundaries  
(EDP4392/07 30 October 2017 WG/CJM)

**Plan EDP 2**  
Environmental Planning Context  
(EDP4392/08 30 October 2017 WG/CJM)

**Plan EDP 3**  
Topography Plan  
(EDP4392/09 30 October 2017 WG/CJM)
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Appendix D – Heritage Assessment
Land at Kesgrave, Suffolk
Heritage Desk Based Assessment
October 2017
Heritage Desk-Based Assessment

Site
Land at Kesgrave, Suffolk

Client
Grainger plc

Date
October 2017

Planning Authority
Suffolk Coastal District Council

Site Centred At
622552 244414

Prepared By
Helen MacQuarrie MA MPhil ACIfA

Approved By
Will Bedford MA MCIfA

Report Status
Final

Orion Ref
PN1557/1
Contents

Executive Summary

1.0 Introduction
2.0 Statutory and Planning Policy Framework
3.0 Archaeological and Historical Background
4.0 Proposed Development and Predicted Impact on Heritage Assets
5.0 Summary and Conclusions

Sources Consulted

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Figure 3 Designated Assets Mapping
Figure 4 1783 Extract from ‘A Map of the County of Suffolk by Joseph Hodkinson’
Figure 5 1824 Extract from ‘Map of Suffolk’, surveyed by C J Greenwood
Figure 6 1884 OS 1:10,560 Scale Map
Figure 7 1905 OS 1:10,560 Scale Map
Figure 8 1928 1:10,560 Scale Map
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Figure 14 Aerial View of the Site (from Google Earth)

Timescales Used in This Report

Prehistoric
Palaeolithic 450,000 - 12,000 BC
Mesolithic 12,000 - 4,000 BC
Neolithic 4,000 - 2,200 BC
Bronze Age 2,200 - 700 BC
Iron Age 700 - AD 43

Historic
Roman 43 - 410AD
Saxon/Early Medieval 410 - 1066AD
Medieval 1066 - 1485AD
Post Medieval 1486 - 1901AD
Modern 1901 - Present Day
Executive Summary

This heritage assessment considers land at Kesgrave, Suffolk. The site is located at grid reference 622552 244414. The site is hereafter referred to as the study site. This assessment has been commissioned to identify and outline the archaeology and heritage constraints within the study site.

The study site, approximately 61ha in size, is irregular in shape and comprises Foxhall Heath, including the Suffolk Aviation Heritage Museum and Long Strattons.

The study site contains the Suffolk Aviation Heritage Museum which comprises an RAF WT Building (possible bomber command WT station) and a US Autovon switching station. These non-designated buildings are not individually registered on the Suffolk HER, but do form part of the polygon for Martlesham Heath Airfield (SHER MRM 083). This is only one of two US Autovon switching stations in the UK. Based on an assessment of criteria set out by Historic England for the designation of military structures (Historic England 2011a), the structures rarity and historical interest, and despite their poor state of preservation they are considered to be of high significance.

To secure development in the vicinity of the switching station will require early consultation with key stakeholders, including Historic England, the LPA conservation team, as well as local stakeholders (Suffolk Aviation Heritage Group / The Roc Research Project / The Suffolk Aviation Heritage Museum / Suffolk County Council). The loss of some of the surrounding rural fields would result in some adverse effects to the significance of the switching station. However, proposals under development, which have been developed with input from Orion Heritage, include securing the future of the aviation museum on the study site, and retaining and sympathetically repurposing the compound for a new use including civic, social and commercial uses providing a sustainable means to conserve the switching statement for the future, which would constitute a concrete benefit to the significance of the switching station. Therefore, subject to informed and sympathetic design, and consultation development within the study site is considered viable and provides an opportunity to better understand and conserve these 20th century military structures.

The northern parts of the study site have been subject to previous geophysical survey which identified no archaeological features. Although further intrusive works to test the results of the geophysics may be required, archaeology of significance that would require preservation in situ are not expected. Previously unrecorded prehistoric and modern (WWII) finds or features cannot be discounted across the rest of the study site. Detailed LiDAR analysis of these areas would be advantageous, providing additional, cost effective and non-intrusive analysis to strengthen the baseline.

No statutory designations (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments or World Heritage Sites) are located within the study site boundary. A total of two scheduled monuments and a single grade II listed building fall within the study area.

Development within the study site is not expected to result in harm to the setting and significance of Pole Hill bowl barrow (NHLE 1008504) or Grange Farmhouse (NHLE 1030421) based on distance and lack of intervisibility.

Part of the study site, the wooded heathland west of Dobbs Lane in the north-east of the study site, forms part of the setting of the two bowl barrows 312m south-west of Dobbs Corner (NHLE 1008507). Further assessment of this asset may be required depending on the emerging masterplan.
1.0 Introduction

1.1 This heritage assessment considers land at Kesgrave, Suffolk (Figure 1). The site is located at grid reference 622552 244414. The site is hereafter referred to as the study site.

1.2 This assessment has been commissioned to identify and outline the archaeology and heritage constraints within the study site. Detailed development proposals have been provided with which to undertake an impact assessment.

1.3 This assessment draws together available information on designated and non-designated heritage assets, topographic and land-use information so as to establish the potential for non-designated archaeological heritage assets within the study site and the potential effect on the significance of nearby designated heritage assets. The assessment includes the results of an examination of published and unpublished records and charts historic land-use through a map regression exercise.

1.4 As a result, the assessment enables relevant parties to assess the significance of heritage/archaeological assets on and close to the site and consider the potential for hitherto undiscovered archaeological assets.

1.5 The study area used in this assessment is 1km from the centre of the study site (Fig. 2 and 3).

Location, Topography and Geology

1.6 The study site, approximately 61ha in size, is irregular in shape and is bound by Foxhall Road to the south, Bell Lane to the west, and the southern limit of Kesgrave to the north. The eastern boundary is formed by Dobbs Lane, the limits of Foxhall Court and the line of an existing field boundary. The site comprises Foxhall Heath, including the Suffolk Aviation Heritage Museum and Long Stropps. The area west of the museum is characterised by enclosed heathland with large, irregular enclosed arable lands to the north and east.

1.7 The wireless station is located on a ridge of slightly higher ground, at 35m OD, which extends from the north-west corner of the study site in a south-eastern direction. The ground slopes from this high ground down to 30m OD in the south-west and north-east areas of the study site. The BSG GeoIndex records that the underlying geology of cretaceous sand or crag, overlain by glaciofluvial drift (Lowestoft Formation, sand and gravel).
2.0 Planning Background And Development Plan Framework

2.1 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.

Ancient Monuments & Archaeological Areas Act 1979

2.2 The Ancient Monuments & Archaeological Areas Act 1979 (as amended) protects the fabric of Scheduled Monuments, but does not afford statutory protection to their settings.

Planning (Listed Building and Conservation Areas) Act 1990

2.3 The Planning (Listed Building and Conservation Areas) Act 1990 sets out broad policies and obligations relevant to the protection of listed buildings and conservation areas and their settings.

2.4 Section 66(1) states: ‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

2.5 Section 69 of the Act requires local authorities to define as conservation areas any ‘areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance’ and Section 72 gives local authorities a general duty to pay special attention ‘to the desirability of preserving or enhancing the character or appearance of that area’ in exercising their planning functions. These duties are taken to apply only within a Conservation Area. The Act does not make specific provision with regard to the setting of a Conservation Area that is provided by the policy framework outlined in section 2.2, below.

National Planning Policy Framework (NPPF) & National Planning Practice Guidance (NPPG)

2.6 Government policy in relation to the historic environment is outlined in section 12 of the National Planning Policy Framework (NPPF), entitled Conserving and Enhancing the Historic Environment. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 12 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Conservation of England’s heritage assets in a manner appropriate to their significance, and
- Recognition of the contribution that heritage assets make to our knowledge and understanding of the past.

2.7 Section 12 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.

2.8 Paragraph 128 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to understand the potential impact of the proposal upon the significance of that asset.

2.9 Heritage Assets are defined in Annex 2 as: A building, monument, site, place, area or landscape identified as having a degree of significance meritting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

2.10 Archaeological Interest is defined as a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.


2.12 Significance is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or...
Setting is defined as: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

The NPPF is supported by the National Planning Policy Guidance (NPPG). In relation to the historic environment, paragraph 18a-001 states that: “Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework’s drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the ‘Core Planning Principles’.”

Paragraph 18a-002 makes a clear statement that any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

Paragraph 18a-013 concludes: “The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.”

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The key test in NPPF paragraphs 132-134 is whether a proposed development will result in substantial harm or less than substantial harm. However, substantial harm is not defined in the NPPF. Paragraph 18a-017 of the NPPG provides additional guidance on substantial harm. It states: “What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed.”

Paragraph 134 of the NPPF outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 18a-020 of the NPPG outlines what is meant by public benefits: “Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.”
In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Local Planning Policy

There are no ‘saved’ policies on the Suffolk Coastal Local Plan relating to archaeological matters.

The Suffolk Coastal District Council Core Strategy was adopted in July 2013. The Core Strategy highlights the importance of the Historic Environment but does not contain any Policy solely relating to this issue. Heritage Assets are mentioned however in the following policies:

Strategic Policy SP15 – Landscape and Townscape
The policy of the council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies………Many of the towns and villages in the district are or distinctive historical and architectural value as well as landscape value and character and the council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas……


Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live, work and visit. Accordingly, development will be permitted where the following criteria are met:

a) proposals should relate well to the scale and character of their surroundings particularly in terms of their siting, height, massing and form;

b) in areas of little or no varied townscape quality, the form, density and design of proposals should create a new composition and point of interest, which will provide a positive improvement in the standard of the built environment of the area generally;

c) alterations and extensions to existing buildings should normally respect the plan form, period, style, architectural characteristics and, where appropriate, the type and standard of detailing and finishes of the original building;

d) in order for extensions to existing buildings to be acceptable, particularly on those that are considered to be architecturally and historically important (including vernacular architecture) and those located in sensitive locations, the extension shall be visually ‘recessive’ and its size and design shall be such that the original building will remain the more dominant feature on the site;

e) layouts should incorporate and protect existing site features of landscape, ecological, heritage or amenity value as well as enhance such features e.g. habitat creation; and

f) attention must be given to the form, scale, use, and landscape of the spaces between buildings and the boundary treatment of individual sites, particularly on the edge of settlements……

East Suffolk has published an archaeological supplementary planning guidance document as part of ‘Section 106 Developers Guide to Infrastructure Contributions in Suffolk’, which states that:

1.1 A high density of archaeological remains survives in Suffolk and the preservation of those remains is a material consideration in the granting of planning consent. Developers should, therefore, discuss the potential impact of their proposed development on archaeological remains prior to submission of planning applications and applicants may be required to undertake an appropriate evaluation before their application is determined.

1.2 Usually, sites with heritage assets can be developed provided that the remains are adequately recorded prior to development and that recording work can be secured by planning conditions. Where planning conditions are not appropriate, obligations will be used to secure the protection and/or investigation of archaeological remains in advance of development. For example, it may be appropriate to secure an area containing significant remains so that it is protected in perpetuity and incorporated into the design of the scheme. The best way to safeguard an archaeological site is for it to be preserved in situ and positively managed. Excavation is very much a second best option as although knowledge can be increased through this process, the site is destroyed. For sites of lesser importance, a planning obligation may require the investigation, recording and excavation of any archaeological features and finds.
1.3 There may also be occasions where planning obligations should be used to secure the conservation and storage in perpetuity of archaeological finds recovered and/or the interpretation of the results of archaeological investigation through publication, touring exhibition or display. Therefore contributions to existing museums or other buildings and facilities or to new buildings or facilities to enable museum storage or display might also be appropriate.

1.4 It is the responsibility of the developer to pay for any and all archaeological work required. This will include any fieldwork, the analysis of findings after fieldwork, conservation of objects where appropriate, report writing and publication, museum archiving, and any educational material required to explain the site or findings to the public. The Archaeological Service can provide a list of archaeological organisations available to carry out work in Suffolk. The scope of any work that needs to be done should be agreed in advance with the Archaeological Service.

Guidance

Historic Environment Good Practice Advice In Planning Note  Managing Significance in Decision-Taking in the Historic Environment (Historic England  2015)

2.25 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and NPPG. It outlines a 7 stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development.

- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Historic Environment Good Practice Advice In Planning Note 3 The Setting of Heritage Assets (Historic England  2015)

2.26 Historic England’s Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.

2.27 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.

2.28 The Good Practice Advice Note sets out a five staged process for assessing the implications of proposed developments on setting:

1. Identification of heritage assets which are likely to be affected by proposals;
2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
3. Assessing the effects of proposed development on the significance of a heritage asset;
4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
5. Making and documenting the decision and monitoring outcomes.

2.29 The guidance reiterates the NPPF in stating that where developments affecting the setting of heritage assets results in a level of harm to significance, this harm, whether substantial or less then substantial, should be weighed against the public benefits of the scheme.
3.0 Archaeological and Historical Background

3.1 The study site forms part of Martlesham Airfield (SHER MRM 083): *The First and Second World War airfield (with later cold war use) at Martlesham Heath, is visible on aerial photographs of Second World War date. Parts are probably of national importance. The First and Second World War airfield (with later Cold War use) covers an c. 490 ha area and is Suffolk’s oldest airfield.*

3.2 The study site contains the site of a WWII Bomber Command wireless station and USAAF Cold War communications centre which now houses the Suffolk Aviation Heritage Museum. The search of the Suffolk Historic Environment Record database did not include an entry for the communication centre. However, the SHER description for Martlesham Airfield makes reference for a specific entry for the station (SHER TM 24 NW 74) which is not included in the SHER results. Further clarification of this has been requested from SHER.

3.3 The SHER also records the site of a round barrow (SHER FXL008) within the Long Strops area: 1950: 'A possible tumulus. A round, bowl-shaped mound approx 5m diam and 0.3m high. No signs of a ditch. Mound is apparently unmutilated.' (R1). 1962: 'There is now no trace of this feature. The siting falls within a cornfield.' (R1) Formerly Foxhall, now in Kesgrave parish following boundary change. Geophysical survey of this area identified no archaeological anomalies, however further investigation of the reporting is required to check that the area of the barrow was part of the survey (Nicholls J, 2013).

3.4 The locations of sites mentioned in the text are shown on Fig. 2 and 3.

Previous Archaeological Investigations

3.5 The following archaeological investigations are recorded within the study site:

- Geophysical Survey – Land east of Bell Lane, Kesgrave (SHER ESF23016)
  A magnetometer survey was undertaken over a 15.8ha site to determine anomalies of possible archaeological interest. The survey was carried out using a sample interval of 0.25m along 1.0m traverses. The geophysical survey identified no anomalies of an archaeological nature. (Lawton, J. 2014. Geophysical Survey Report: Land East of Bell Lane, Kesgrave).

- Evaluation – Land east of Bell Lane (SHER KSG 036)
  Outline record only, works by (SCCAS).

- Geophysical Survey – Long Strops, Ipswich (SHER ESF22088)
  No clear archaeological anomalies were identified. Nicholls J. 2013. Geophysical Survey Report, Long Strops, Ipswich.

Non-Designated Heritage Assets

Unknown

3.6 The SHER records the site of an undated round barrow (SHER FXL008), and two outline records for archaeological investigations of the study site (KSG 035 and KSG 036). As discussed, the barrow falls within the area of the geophysical survey and no evidence of this monument has been identified.

3.7 An undated burnt mound (SHER FXL 029) is recorded c. 650m south-west of the study site, within which a small scatter of heavily burnt flints and two flint flakes of unconfirmed date were recovered.

3.8 A road, track and bank of boundary marker of unknown date are visible on aerial photographs as earthworks (SHER KSG 029), c. 200m east of the study site boundary. These do not appear to extend within the study site boundary. A possible / unconfirmed Bronze Age ring ditch (SHER KSG 028) is recorded as to the north of these earthworks, c. 250m east of the study site.

3.9 Probably field boundaries of uncertain date are visible on aerial photographs visible as earthwork (SHER KSG 025), c. 300m west of the study site.

3.10 Two undated burnt pits were recorded during an archaeological evaluation at Ropes Drive / Bell Lane (SHER KSG 032), c. 960m north of the study site.

Prehistoric

3.11 A human mandible of Palaeolithic date, known as the Foxhall Jaw (SHER FXL 001) was found in 1855 reputedly within the gravel heap of a coprolite pit, c. 800m west of the study
site. An artefact scatter of implements and burnt flint was also found on the site. A Palaeolithic flint implement (SHER FXL 001) was also found in a pit, 900m south-east of the study site and a Palaeolithic flaked flint (SHER FXL MISC) from ‘crag’ sand of the Foxhall Sanatorium area, c. 600m south-west of the study site.

3.12 No evidence of Neolithic activity is recorded within the study site boundary. Two residual finds are recorded within the wider study site: a flint adze, polished on its cutting edge, found on the corner of Laurel Avenue and Edmonton Close (SHER KSG 004), c. 950m west of the study site boundary and a small curved flint sickle found at Grange Farm circa 1938 (SHER KSG 001), c. 30m north of the study site.

3.13 In addition to the previously mentioned possible Bronze Age ring ditch (SHER KSG 028) recorded c. 250m east of the study site, a Bronze Age Stone axe-hammer (SHER KSG 005) has been recovered at Bulls Field, c. 370m north of the study site boundary.

3.14 The study site contains the site of a non-designated Bronze Age round barrow (SHER MRM001), which is located in the grassed area in the west of the study area. This forms part of a group of seven further possible Bronze Age barrows within the wider study area with three of which are scheduled. Closest to the study site are ‘two bowl barrows 312m south-west of Dobbs Corner’ (NHLE 1008507), which lie in wooded heathland to the west of Dobbs Lane, 75m north of the study site boundary. The two barrows are situated within what was once a small cemetery, including four others. The cemetery was archaeologically investigated in 1919.

3.15 Aerial photography has highlighted a number of possible late prehistoric sites within the study area. This includes ditched trackways, field boundaries and possible crofts possibly dating from the Iron Age to the post-medieval period (SHER KSG 027) and late prehistoric field systems and a possible trackway (SHER KSG 027) in the area north of the study area occupied by sub-urban housing. An extensive ditched field system and interconnecting tracks of probable prehistoric date (recorded as unknown) (SHER FXL 031) are visible as cropmarks on aerial photographs, to the west of Foxhall Hall, c. 400m south of the study area.

Roman

3.16 The SHER records a total of three entries relating to Romano-British finds or features, none of which fall within the site boundary. In-situ evidence, including a pit, Roman ceramics and roof tile (SHER RMA 007), was recorded during excavation of a pipe trench near the pumping station, 970m west of the study area. The topstone of a Roman puddingstone quern has been re-used within the wall of 832 Foxhall Road (SHER RMA 005) and Roman pottery sherds have been recovered from the bank of Mill River (SHER FXL 018), 820m south of the study site.

Early Medieval

3.17 Kesgrave is recorded as a pre-conquest manor, Gressgrava, in the Domesday Survey. Oslac of Kesgrave was recorded as Lord, with Edric of Laxfield and Godwin (son of Alfhere) recorded as the overlords in 1066 (Open Domesday 2017). The exact location of the early medieval manor is not known. From the medieval period the historic core of Kesgrave is located at the junction of Bell Lane and Main Street, 1km north of the study site, which may have been the centre of earlier settlement also.

3.18 There are no early medieval remains recorded within the study site. In 1992 a bronze mount or ‘casket terminal’ in the form of a beast or dragons head (SHER FXL 030) was recovered by metal detecting, 800m south of the study site.

3.19 The SHER does not include the Anglo-Saxon cremation burial that was identified during archaeological excavation of the Bronze Age cemetery in 1919, 75m north of the study site boundary. Two of the surviving barrows are scheduled (NHLE 1008507).

Medieval

3.20 The medieval core of Kesgrave is located at the junction of Bell Lane and Main Street, 1km north of the study site, centred around the grade II* listed Church of All Saints (NHLE 1030420). The earliest surviving parts of the church date the 13th century, with 14th, 15th, 16th, 18th and 20th century alterations. Approximately 750m to the south of the study site is the site of a second medieval church, All Saints Church (SHER FXL 005). A single stretch of the medieval church survives as the north wall of a barn. The site fell into decay in the middle of the 16th century.

3.21 Foxhall heath lies between these two areas of medieval settlement. No medieval finds or features are recorded within the study site boundary. Medieval activity within the study site is
The early and developing boundaries of the airfield in relation to the study site and the post-medieval field systems within the wider study area (SHER MRM124 and KSG030). None of these are recorded extended within the study site boundary.

Post-Medieval / Modern

The 1787 county map by Joseph Hodkinson (Figure 4) shows the study site within Foxhall Heath, to the south of the Kesgrave. A number of roads are recorded crossing the heath. No structures are recorded. The modern parish boundary of Foxhall extends to Foxhall Road and north along Dobbs Lane and does not include Foxhall Heath.

The 1824 extract from ‘Map of Suffolk’ surveyed by C J Greenwood (Figure 5) shows the study site within Foxhall Heath. No structures or roads are shown within the study site boundary.

The 1884 Ordnance Survey (Figure 6) indicates that the heathland has been partially enclosed, with heath land remaining along the northern and western limits of the study site. A sand pit is shown in the centre of the study site indicating disturbance to the north-east of the later WT station. A number of footpaths are recorded crossing the heathland.

The 1928 Ordnance Survey (Figure 8) indicates that entire study site is characterised by heathland. A hospital for infectious diseases (still surviving as Foxhall Court) is shown to the immediate east of the study site. No structures are recorded within the study site. No changes are shown on the subsequent 1938 (Figure 9) and 1957-58 (Figure 10) mapping, however the T shaped structure is shown on the 1945 historical aerial photograph (Google Earth 2017). The WT Station and compound is shown on the 1971 Ordnance Survey (Figure 11) by which point it was a US Defence Communications Agency AUTOVON switching station.

WWII Bomber Command wireless station and USAF Cold War communications centre

The Suffolk Aviation Heritage Group have an on-going research project, The Roc Research Project, into the history of the site. This research is on-going and not formally published, the following information taken from their website (http://suffolkaviationheritage.org.uk/rochistory.htm).

The exact origins of the buildings on site are not currently clear. No structures are shown on the 1938 to 1957-58 Ordnance Survey, presumably a deliberate omission due to their military character. The T shaped structure is shown on the 1945 historical aerial photograph (Google Earth 2017) and the Roc Research Project refer to a Luftwaffe aerial reconnaissance photograph dating from August 1940 which show the building surrounded by bomb craters, resulting from attack by German aircraft two weeks earlier (Suffolk Aviation Heritage Group 2017). The working hypothesis is that this structure was a Bomber Command Wireless Telegraphy Station during WWII, however this remains the subject of on-going research (Suffolk Aviation Heritage Group 2017).

In terms of the pre-WWII use of the site, the history of Martlesham Airfield goes back to 1917 when it opened as the base for the Aeroplane Experimental Unit. In 1922 a fire damaged part of the technical buildings and the airfield was subsequently enlarged to become the Aeroplane and Armament Experimental Establishment (AAEE). From 1939 the first fighter squadron was stationed on the airfield with a permanent squadron from 1940 and throughout the Second World War, being used by the RAF and from 1943 by elements of the USAF. The airfield reverted to RAF use after the war and was finally closed in 1973 (Smith, 1995 and Kinsey, 1983).

The early and developing boundaries of the airfield in relation to the study site and the communications centre requires further research. Suffolk Aviation Heritage Group suggest that the origins of the communications centre date to the 1930’s when it formed one of three
timing huts situated along the southern boundary of the airfield (Suffolk Aviation Heritage Group 2017). A review of relevant archival material held at the National Archives has identified plans, sales particulars and reports which might elucidate the date and development of the site in relation to Martlesham Airfield.

3.32 The Roc Research Project is currently researching the origins of the colloquial name for the site, ‘the Roc’, which may relate to its pre-1953 use by the Royal Observer Corps and the bomb attack of the site in 1940. The role that the site played in the Battle of Britain development of military radio communication network requires clarification.

3.33 Between 1953-1992 the site functioned as the Former United States Air Force / Defence Communications Station. It was originally a US Air Force Radio Relay Location, providing communications for US and NATO forces in Europe and South-East Asia, using an array of ultra-high frequency and super-high frequency (microwave) radio communications systems.

3.34 In 1969 the US Defence Communications Agency launched the Automatic Voice Network (AUTOVON) switching system. AUTOVON was designed to carry mission-critical and administrative voice (telephone) traffic for the US Armed Forces. Globally, the network connects military installations in CONUS, Europe, Japan, Korea, Hawaii, Alaska and Panama. The European stations were installed between 1969 and 1970 including two in the UK, Hillingdon and Martlesham. The other European centres were located at Langerkopf, Feldberg, Naples, Donnersberg, Schoenfeld, Humosa, Athens and Coltano. It was described as a ‘vitaly important element to US military global communications throughout most of the Cold War, until superseded by the upgraded Digital European Backbone (DEB) system in the late 1980s (SAHG 2017).

3.35 The site was self-sufficient during the 1970 – 1970’s with living quarters, dining facilities, grocery store, petrol station and social club. The Suffolk Aviation Heritage Group and Bunkertours websites have records and photographs of American personnel living and worked on the base during this time.

3.36 The Suffolk Aviation Heritage Museum was opened in 2008. The museum is run by the Suffolk Aviation Heritage Group which was established in 2002. Suffolk Aviation Heritage Group is an all-inclusive charitable organisation and has received external funding for the museum. It is currently not known if a heritage management plan for the conservation and development of the site has been created.

Historic Landscape Characterisation, NMP Mapping, LiDAR, Aerial Photography

3.37 Historic Landscape Characterisation mapping (not illustrated) records majority of the site as 18th-century and later enclosure, delineated by late 19th century field boundaries. The area of the communications centre is recorded as industrial.

3.38 The National Mapping Project (NMP) records no features within or immediately adjacent to the study site boundary. The closest identified feature to the study site is a possible Bronze Age ditch (SHER KSG 028) and a trackway and boundary bank of unknown date (SHER KSG 029), c. 300m east of the study site.

3.39 A rapid appraisal of readily available oblique and vertical aerial photographic sources (Bing Maps, Google Earth and Google maps) and LiDAR imagery (Environment Agency) was undertaken to identify previously unrecorded features. No easily identifiable archaeological features were identified, however more detailed analysis of LiDAR imagery would be advised.

Summary of identified heritage assets and statement of significance

Martlesham Heath Airfield (SHER MRM 083) and the USAAF Cold War communications centre which now houses the Suffolk Aviation Heritage Museum

3.40 The study site contains the Suffolk Aviation Heritage Museum which comprises:

- Former RAF WT Building, original administration rooms
- The former standby power house (existing museum building);
- Former USAF canteen and toilet block etc (includes remaining section of original WT building blast wall)
- Former Autovon Building;
- Former DEB Building;
- Two mid-20th century telecommunications masts;
The study site falls within Martlesham Airfield (SHER MRM 083) and contains a structure which was extant and bombed during WWII. The former RAF WT Building (the T shaped structure within the museum compound) is shown on a 1945 historical aerial photograph (Google Earth 2017) and a Luftwaffe aerial reconnaissance photograph (August 1940), which show the building surrounded by bomb craters, resulting from attack by German aircraft two weeks earlier (Suffolk Aviation Heritage Group 2017). The working hypothesis is that this structure was a Bomber Command Wireless Telegraphy Station during WWII, however this remains the subject of on-going research (Suffolk Aviation Heritage Group 2017).

The airfield covers an c. 490 ha area including the study site and the area of Martlesham to the east. The airfield does not survive as an intact, legible landscape, with much of the original area occupied by modern residential development. However, the extent of the airfield provides useful perimeter for the setting of the WWII and Cold War buildings which survive to date. The role and physical character of the communication station during WWII remains the subject of on-going research and there is potential for previously unrecorded buried remains (discussed in more detail below) associated with the airfield. As recognised in the HER description of the airfield (SHER MRM 083) the significance of individual elements is likely to vary.

The designation of Cold War sites now tends to involve listing more often as a response than scheduling. As such, the designation guide for military structures (Historic England 2011a) and utilities and communications structures (Historic England 2011b) has been consulted. Intelligence and Communications, is recognised as playing an ‘ever-growing part in modern defence and security’ with the development of radio communication, signal complexes and networks (Historic England 2011a). Royal Observer Corps posts are also discussed. The guidance states that ‘intactness is key in assessment’ (Historic England 2011a).

Rarity, group value, military and technological significance, architectural or structural interest, wall art, survival and technological innovation are cited as the principal considerations in the assessment of designation of Cold War Structures. Other considerations include the centrality of buildings to British and/or NATO defence policy and their representation of distinct phases of the Cold War.

Taking these factors into consideration, the principal significance of these buildings relate to their rarity: there appears to be only one comparable site in the UK, the US Autovon switching station at Hillingdon (the US built ten in Europe with just two in Britain). This also represents technological innovation interest, although it is noted that much of the original fittings have been stripped and the buildings are in poor condition. On balance, despite their relatively poor state of preservation, and taking into account the historical and communal value of the buildings in terms of the WWII defence of Britain and the Cold War, it is considered that they are of high significance.

Past Impacts, Summary of potential archaeological assets and statement of significance

The available evidence has been assessed in an attempt to determine the nature and extent of any previous impacts upon any potential below ground archaeological deposits, which may survive within the bounds of the proposed development site.

Previous impacts within the remainder of the study site include sand quarrying identified on late 19th century mapping, agricultural activity associated with the 18th / 19th century enclosure of the site and WWII bomb damage.

The northern part of the study site has been subject to geophysical survey which has not identified archaeological finds or features. The SHER entry is preliminary and further assessment of the final reports is required including whether further intrusive works were recommended. However, on the basis of these results, at this stage the potential for remains which would result in a design or planning constraint is considered low.

Although the study site is located an area rich in prehistoric archaeology, analysis of available evidence has not identified evidence for probable prehistoric occupation within the study site itself. This is based in part on the negative results of the geophysical surveys in the north of the study site. On balance, fragmentary prehistoric remains of local interest cannot be discounted at this stage.

The study site lies in the agricultural hinterland of known historic settlement. As such there is considered low potential for previously unrecorded early medieval, medieval and post-medieval remains within the study site boundary. Finds and features associated with the
general post-medieval agricultural (or industrial) landscape are unlikely to be of more than local significance.

3.51 There is considered medium-high potential for previously unrecorded sub-surface remains associated with the WWII airfield (SHER MSF22020). This may comprise residual finds, trenches, preserved surfaces. Based on available evidence this is likely to comprise residual artefacts and cut features / trenches of local to regional interest; well-preserved deposits of a level that would warrant preservation in situ are not expected.

Designated Heritage Assets

3.52 No statutory designations (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments or World Heritage Sites) are located within the study site boundary.

3.53 The following section aims to identify designated assets which might be sensitive to change within the study site boundary.

3.54 A basic search radius was used to establish which heritage assets required assessment for impacts, which is usually sufficient to ensure all assets which require consideration are properly assessed. In some limited cases, some particular assets can have a wider setting which is sensitive, therefore the wider area outside of the search radius was also considered in the preparation of this assessment, to determine if additional highly graded heritage assets required inclusion in this assessment. No additional heritage assets were identified.

3.55 A total of two scheduled monuments and a single grade II listed building fall within the study area. The distribution of designated heritage assets in relation to the study area can be found in Figure 3.

Scheduled Monuments

3.56 Two bowl barrows 312, south-west of Dobbs Corner (NHLE 1008507), lie in wooded heathland to the west of Dobbs Lane, 75m north of the study site boundary. The Historic England description states that they survive relatively well, although a trench has been dug into one of the mounds. The two barrows are situated within what was once a small cemetery, including four others. The other four were excavated in 1919, one of which contained an Anglo-Saxon cremation burial. The cemetery, in turn, formed part of a much larger group of barrows, others of which survive as visible monuments in the parishes of Brightwell, Foxhall and Martlesham and Waldingfield; together these will provide evidence of the nature and extent of Bronze Age activities in the area.

3.57 The monuments are located in an area of cleared wooded heathland adjacent to an access route through the woodland to the recreation grounds north of the study site. The wooded heathland context of the monument extends south within the study area, although the woodland limits intervisibility and the area in which the monument can be experienced. As the wooded heathland within the study area forms part of the setting of the monument, alterations within this area would require further assessment. The de-forested, arable parts of the site form part of the wider landscape of the monument and make a limited contribution to its significance. The scheduled barrows are less sensitive to change in this area. This is based on the fact that no Bronze Age occupation evidence has been identified during previous phases of investigation in this area.

3.58 Pole Hill bowl barrow (NHLE 1008504) is located to the north of Foxhall Road, c. 500m south-east of the study site. The scheduled description states that, 'Although a wartime trench has been dug into Pole Hill bowl barrow, the greater part of the monument survives well and will retain important archaeological information. Evidence concerning the construction of the barrow, the manner and duration of its use, and also the local environment, at and prior to the time of its construction, will be contained in the mound and in the soils preserved beneath it. The barrow is one of a large group recorded in the parishes of Martlesham, Brightwell and Foxhall, including a small cemetery consisting of six barrows of varied type which lay between 300m and 500m to the north east and which were excavated in 1953. Together, these will provide evidence of the nature and extent of Bronze Age activities in the area'.

3.59 The scheduled monument is located within an arable field delineated by a number of young trees. The western part of the study site is partially visible from the monument with woodland obscuring the view to the north-east part of the study site. The monument is not clearly visible from the study site boundary, nor does the study site obscure views between this and the aforementioned scheduled barrows (NHLE 1008507). The study site forms part of the wider landscape of the monument, however is considered to make a minor contribution to its significance.
Listed Buildings

3.60 The grade II listed Grange Farmhouse (NHLE 1030421) is located c. 500m north of the study site boundary. The farmhouse dates to the late 16th century with alterations of 18th, early 19th and early 20th century date. The listing description makes note of the form and fabric of the buildings, the windows, porch and roof.

3.61 The structure is a public house and restaurant. Beyond the car park and gardens which form the principal context of the farmhouse, recreational grounds provide a landscape buffer between it and the suburban housing of Kesgrave. The setting of the monument does not include the study site and therefore the significance of the asset will not be affected by change within the study site boundary.
4.0 Proposed Development and Predicted Impact on Heritage Assets

Site Conditions

4.1 The site comprises Foxhall Heath, including the Suffolk Aviation Heritage Museum and Long Stropps. The area west of the museum is characterised by enclosed heathland with large, irregular enclosed arable lands to the north and east.

The Proposed Development

4.1 Only initial outline proposals of the proposed development scheme are available at the time of writing. These comprise residential development in many of the surrounding fields with associated infrastructure and a new primary school also proposed. Proposals are also being developed for the signal station compound, including retaining and sympathetically repurposing these buildings for civic, social and commercial use, as well as for the continued use of the aviation museum, whose future would be secured.

Potential Non-Designated Heritage Constraints and Recommendations

4.2 The study site contains the Suffolk Aviation Heritage Museum which comprises:

- Former RAF WT Building, original administration rooms
- The former standby power house (existing museum building);
- Former USAF canteen and toilet block etc (includes remaining section of original WT building blast wall)
- Former Autovon Building;
- Former DEB Building;
- Two mid-20th century telecommunications masts;

4.3 These buildings do not appear to be individually registered on the Suffolk HER, but do form part of the polygon for Martlesham Heath Airfield (SHER MRM 083). The complex of building includes a possible WWII Bomber Command Wireless Telegraphy Station (subject of on-going research (Suffolk Aviation Heritage Group 2017) and one of only two US Autovon switching stations in the UK. On balance, despite their relatively poor state of preservation, and considering the historical and communal value of the buildings in terms of the WWII defence of Britain and the Cold War, it is considered that they are of high significance.

4.4 To secure development in the vicinity of the switching station will require early consultation with key stakeholders, including Historic England, the LPA conservation team, as well as local stakeholders (Suffolk Aviation Heritage Group / The Roc Research Project / The Suffolk Aviation Heritage Museum / Suffolk County Council). The loss of some of the surrounding rural fields would result in some adverse effects to the significance of the switching station. However, proposals under development include securing the future of the aviation museum on the study site, and retaining and sympathetically repurposing the compound for a new use including civic, social and commercial uses providing a sustainable means to conserve the switching statement for the future, which would constitute a concrete benefit to the significance of the switching station. Therefore, subject to informed and sympathetic design, and consultation development within the study site is considered viable and provides an opportunity to better understand and conserve these 20th century military structures.

4.5 The northern parts of the study site have been subject to previous geophysical survey which identified no archaeological features. Although further intrusive works to test the results of the geophysics may be required, archaeology of significance that would require preservation in situ are not expected. Previously unrecorded prehistoric and modern (WWII) finds or features cannot be discounted across the rest of the study site. Detailed LiDAR analysis of these areas would be advantageous, providing additional, cost effective and non-intrusive analysis to strengthen the baseline.

Potential Designated Heritage Constraints & Recommendations

4.6 The proposed development would not have a direct physical impact on any designated heritage assets.

4.7 Designated assets within the study area includes two bowl barrows 312m south-west of Dobbs Corner (NHLE 1008507), 75m north of the study site boundary; Pole Hill bowl barrow (NHLE 1008504) c. 500m south-east of the study site and the grade II listed Grange Farmhouse (NHLE 1030421) is located c. 500m north of the study site boundary.
4.8 Development within the study site is not expected to result in harm to the setting and significance of Pole Hill bowl barrow (NHLE 1008504) or Grange Farmhouse (NHLE 1030421) based on distance and lack of intervisibility.

4.9 The study site, particularly the wooded heathland west of Dobbs Lane in the north-east of the study site forms part of the setting of the two bowl barrows 312m south-west of Dobbs Corner (NHLE 1008507). Further assessment of this asset is recommended based on the developing masterplan. Further assessment will also need to take into consideration the results of archaeological investigations in the north of the study site in relation to the recorded possible site of a round barrow in the northern part of the study site (SHER FXL008).
5.0 Summary and Conclusions

5.1 This heritage assessment considers land at Kesgrave, Suffolk (Figure 1). The site is located at grid reference 622552 244414. The study site, approximately 61ha in size, is irregular in shape and is bound by Foxhall Road to the south, Bell Lane to the west, and the southern limit of Kesgrave to the north. The site comprises Foxhall Heath, including the Suffolk Aviation Heritage Museum and Long Stropps.

5.2 The study site contains the Suffolk Aviation Heritage Museum which comprises an RAF WT Building (possible bomber command WT station) and a US Autovon switching station. These non-designated buildings are not individually registered on the Suffolk HER, but do form part of the polygon for Martlesham Heath Airfield (SHER MRM 083). This is only one of two US Autovon switching stations in the UK. Based on an assessment of criteria set out by Historic England for the designation of military structures (Historic England 2011a), the structures rarity and historical interest, and despite their poor state of preservation they are considered to be of high significance.

5.3 To secure development in the vicinity of the switching station will require early consultation with key stakeholders, including Historic England, the LPA conservation team, as well as local stakeholders (Suffolk Aviation Heritage Group / The Roc Research Project / The Suffolk Aviation Heritage Museum / Suffolk County Council). The loss of some of the surrounding rural fields would result in some adverse effects to the significance of the switching station. However, proposals under development include securing the future of the aviation museum on the study site, and retaining and sympathetically repurposing the compound for a new use including civic, social and commercial uses providing a sustainable means to conserve the switching statement for the future, which would constitute a concrete benefit to the significance of the switching station. Therefore, subject to informed and sympathetic design, and consultation development within the study site is considered viable and provides an opportunity to better understand and conserve these 20th century military structures.

5.4 The northern parts of the study site have been subject to previous geophysical survey which identified no archaeological features. Although further intrusive works to test the results of the geophysics may be required, archaeology of significance that would require preservation in situ are not expected. Previously unrecorded prehistoric and modern (WWII) finds or features cannot be discounted across the rest of the study site. Detailed LiDAR analysis of these areas would be advantageous, providing additional, cost effective and non-intrusive analysis to strengthen the baseline.

5.5 No statutory designations (Listed Buildings, Conservation Areas, Scheduled Ancient Monuments or World Heritage Sites) are located within the study site boundary. A total of two scheduled monuments and a single grade II listed building fall within the study area.

5.6 Development within the study site is not expected to result in harm to the setting and significance of Pole Hill bowl barrow (NHLE 1008504) or Grange Farmhouse (NHLE 1030421) based on distance and lack of intervisibility.

5.7 Part of the study site, the wooded heathland west of Dobbs Lane in the north-east of the study site, forms part of the setting of the two bowl barrows 312m south-west of Dobbs Corner (NHLE 1008507). Further assessment of this asset may be required depending on the emerging masterplan.
Sources

General
Imperial War Museum (IWM),
National Archives (NA),
The British Library
Suffolk Record Office (Ipswich branch)
Suffolk Historic Environment Record (SHER)

Websites
Archaeological Data Service – www.ads.ahds.ac.uk
British History Online – http://www.british-history.ac.uk/
British Geological Society GeolIndex - http://bgs.ac.uk/geolindex/
Heritage Gateway - www.heritagegateway.org.uk
MAGIC - www.magic.gov.uk
Pastscape - www.pastscape.org.uk
Bing Maps - https://www.bing.com/maps/
Environment Agency - https://data.gov.uk/publisher/environment-agency
The Suffolk Aviation Heritage Group - (http://suffolkaviationheritage.org.uk/rochistory.htm
The Defence of Britain Archive (http://archaeologydataservice.ac.uk/archives/view/dob/download.cfm
AUTOVON switching station sites exist in the United States - http://coldwar-c4i.net/AUTOVON/switches.html

Archival / Cartographic Material
1783 Extract from 'A Map of the County of Suffolk by Joseph Hodskinson'
1824 Extract from 'Map of Suffolk', surveyed by C J Greenwood
1884 OS 1:10,560 Scale Map
1905 OS 1:10,560 Scale Map
1928 1:10,560 Scale Map
1938 OS 1:10, 560 Scale Map
1957 - 58 OS 1:10,000 Scale Map
1971 OS 1:10,000 Scale Map
1984 OS 1:10,000 Scale Map
2000 OS 1:10,000 Scale Map

Bibliographic
DCMS. 2010. Scheduled Monuments. Identifying, protecting, conserving and investigating nationally important archaeological sites under the Ancient Monuments and Archaeological Areas Act 1979 March 2010
Department of Communities and Local Government. 2014. Planning Practice Guidance
Department of Communities and Local Government/Department of Culture Media and Sport/English Heritage. 2010. PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide
Historic England 2011a Designation Listing Selection Guides Military Structures
Historic England. 2011b. Designation Listing Selection Guides Utilities and Communications Structures
In order to understand the nature and extent of the surrounding archaeological resource, a study area of a 1km radius from the site centre was adopted. The following gazetteer represents all of the entries from the Suffolk Historic Environment Record. Where previously unrecorded heritage assets are identified, these will be given an Orion reference e.g. (Orion X), otherwise these will be referenced by the Suffolk Historic Environment Record or English Heritage reference number.

**Abbreviations:**
- **SHER:** Suffolk Historic Environments Record
- **PREFREF:** Suffolk Historic Environments Record monument identification reference number

<table>
<thead>
<tr>
<th>SHER MONUID / ORION REF</th>
<th>NAME</th>
<th>MONUMENT TYPE</th>
<th>PERIOD</th>
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<tr>
<td>KSG 036</td>
<td>OUTLINE RECORD: LAND EAST OF BELL LANE EVALUATION, KESGRAVE (GSB) GEO (SCCAS) EVAL</td>
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<td>FXL 029</td>
<td>SMALL ARTEFACT SCATTER OF HEAVILY BURNT FLINTS ETC</td>
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<td>ARTEFACT SCATTER OF IMPLEMENTS AND BURNT FLINT, UNKNOWN DATE AND LOCATION (UN)</td>
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<td>FOXHALL HALL PIT</td>
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<tr>
<td>FXL 001</td>
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<td>NEOLITHIC</td>
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<td>KSG 005</td>
<td>BULLS FIELD</td>
<td>FINDSPOT</td>
<td>BRONZE AGE</td>
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<tr>
<td>KSG 027</td>
<td>MEDIEVAL DITCHED TRACKWAYS, FIELD BOUNDARIES AND CROFTS, VISIBLE AS CROPMARKS.</td>
<td>TRACKWAY, FIELD BOUNDARY, CROFT?</td>
<td>EARLY IRON AGE TO IPS: POST MEDIEVAL</td>
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<td>KSG 026</td>
<td>PREHISTORIC FIELD BOUNDARIES AND TRACKWAY, VISIBLE AS CROPMARKS.</td>
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<td>RMA 007</td>
<td>FEATURES, POTTERY ETC. FOUND IN WATER PIPE TRENCH, W OF PUMPING STATION BESIDE TRACK.</td>
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<td>ROMAN</td>
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<td>832 FOXHALL ROAD</td>
<td>FINDSPOT</td>
<td>ROMAN</td>
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<td>FXL 018</td>
<td>MONUMENT FARM (ROM)</td>
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<td>MONUMENT TYPE</td>
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<td>FXL 018</td>
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<td>RING DITCH, CIRCULAR ENCLOSURE, TREE ENCLOSURE RING?</td>
<td>MEDIEVAL TO 19TH CENTURY</td>
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<td>RING DITCH OF UNKNOWN DATE, VISIBLE AS AN EARTHWORK.</td>
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<td>MEDIEVAL TO MODERN</td>
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<td>FXL 005</td>
<td>FOXHALL FARM (PMED)</td>
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<td>KSG MISC</td>
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<td>MILITARY AIRFIELD, CONTROL TOWER, HANGAR, BARRACKS, TELEPHONE EXCHANGE</td>
<td>FIRST WORLD WAR TO COLD WAR</td>
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<td>MRM 083</td>
<td>MARTLESHAM HEATH AIRFIELD; FOXHALL HEATH.</td>
<td>WEAPONS PIT?</td>
<td>SECOND WORLD WAR</td>
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<td>KSG 024</td>
<td>TWO GROUPS OF WORLD WAR II TRENCHES AND A WEAPONS PIT, VISIBLE AS EARTHWORKS.</td>
<td>GUNPOST?, SLIT TRENCH, ANTI AIRCRAFT BATTERY</td>
<td>SECOND WORLD WAR</td>
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<td>KSG 023</td>
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<td>SLIT TRENCH</td>
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<td>WORLD WAR II LIGHT ANTI-AIRCRAFT ARTILLERY EMEPLACEMENT, VISIBLE AS AN EARTHWORK.</td>
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<td>SECOND WORLD WAR</td>
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The following gazetteer represents all archaeological events recorded on the SHER.

**Abbreviations:**
- **SHER:** Suffolk Historic Environments Record
- **EVUID:** Suffolk Historic Environments Record Event ID

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<th>Description</th>
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<td>ESF18936</td>
<td>WATCHING BRIEF - SUFFOLK NUFFIELD HOSPITAL</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>WATCHING BRIEF - 2 SITE VISITS DURING OVERBURDEN REMOVAL, AREA PARTLY TRUNCATED BY PREVIOUS BUILDING WORK BUT POCKETS OF PODSOLISED (LEACHED) HEATH SOIL SURVIVED. NO FINDS OR FEATURES NOTED.</td>
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<td>ESF18957</td>
<td>WATCHING BRIEF - GRANGE FARM PRIMARY SCHOOL</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>WATCHING BRIEF ON NEW PRIMARY SCHOOL - 2 SITE VISITS TO SEE BUILDING FOOTPRINT AND CAR PARK, STRIPPED OF 300MM TOPSOIL ONTO CLEAN SAND. NO FINDS OR FEATURES.</td>
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<td>ESF18958</td>
<td>WATCHING BRIEF - SOUTH SIDE ROPES DRIVE</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>LARGE RESIDENTIAL DEVELOPMENT ON THE FORMER HEATH, AREA C.2H. 2 SITE VISITS, VISIBILITY FAIRLY GOOD. 4 SMALL AREAS OF BURNT SUBSOIL, LIKELY TO BE FOGGLIFTERS (FIDOS) WITH NO FINDS. U/S FINDS INCLUDE FLINT FLAKE, ONE MED COURSEWARE SHERD AND SMALL TILE/</td>
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<tr>
<td>ESF18959</td>
<td>WATCHING BRIEF - BELL LANE TO ROPES DRIVE</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>WATCHING BRIEF ON CONSTRUCTION OF BUS ONLY LINK ROAD, C.200M LONG BETWEEN BELL LANE AND ROPES DRIVE. ONLY 15-20CM OF TOPSOIL REMOVED SO STILL OLD TOP/SUBSOIL. NO FINDS OR FEATURES NOTED. 2 SITE VISITS MADE, WHOLE LENGTH INSPECTED. DEEPER DISTURBANCE RE</td>
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<td>ESF18960</td>
<td>MONITORING - DOBBS CORNER</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>MONITORING OF WORKS ASSOCIATED WITH ANGLIAN WATER REVEALED POSSIBLE MED DITCH WITH MED POTTERY SCATTER ON SURFACE. EVENT NOT MAPPED FULLY AS FULL EXTENT UNKNOWN.</td>
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<td>ESF22864</td>
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<tr>
<td>ESF23016</td>
<td>GEOGRAPHICAL SURVEY - LAND EAST OF BELL LANE, KESGRAVE</td>
<td>GSB PROSPECTION</td>
<td>A MAGNETOMETER SURVEY WAS UNDERTAKEN OVER A 15.8HA SITE TO DETERMINE ANOMALIES OF POSSIBLE ARCHAEOLOGICAL INTEREST. THE SURVEY WAS CARRIED OUT USING A SAMPLE INTERVAL OF 0.25M ALONG 1.0M TRAVERSERS. THE GEOPHYSICAL SURVEY IDENTIFIED NO ANOMALIES OF AN ARC.</td>
</tr>
<tr>
<td>ESF24256</td>
<td>EVALUATION KESGRAVE HEATH PRIMARY SCHOOL</td>
<td>SUFFOLK COUNTY COUNCIL ARCHAEOLOGICAL SERVICE</td>
<td>AN ARCHAEOLOGICAL EVALUATION CARRIED OUT IN ADVANCE OF A NEW BUILDING AND PLAYGROUND EXTENSION. NO ARCHAEOLOGICAL FEATURES WERE RECORDED. TWO TRENCHES 1.2M WIDE WERE OPENED TO A DEPTH OF 0.5M.</td>
</tr>
</tbody>
</table>
Title: Site Location
Address: Land at Kesgrave, Ipswich, Suffolk
Title: Non-Designated Assets mapping
Address: Land at Kesgrave, Ipswich, Suffolk
Fig.3: Designated Assets mapping

Address:
Land at Kesgrave, Ipswich, Suffolk
Title: Fig. 4: 1783 Extract from 'A Map of the County of Suffolk by Joseph Hodkinson'
Address: Land at Kesgrave, Ipswich, Suffolk
Fig. 5: 1824 Extract from 'Map of Suffolk', surveyed by C J Greenwood

Address:
Land at Kesgrave, Ipswich, Suffolk
Title: Fig. 6: 1884 OS 1:10,560 Scale Map
Address: Land at Kesgrave, Ipswich, Suffolk

Legend

1:12,500 at A4

Site

0 400m

orion.
Title: 1905 OS 1:10,560 Scale Map
Address: Land at Kesgrave, Ipswich, Suffolk
Fig. 9: 1938 OS 1:10,560 Scale Map
Address:
Land at Kesgrave, Ipswich, Suffolk
Fig. 10: 1957-58 OS 1:10,000 Scale Map
Address:
Land at Kesgrave, Ipswich, Suffolk
ECOLOGICAL APPRAISAL
BELL LANE
KESGRAVE
IPSWICH
IP10 0AH

APRIL 2017

ON BEHALF OF
HOLBURY CONSULTANCY SERVICES LTD.
The Old Squash Court,
Rempstone Hall,
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Telephone: [Redacted]
E-mail: [Redacted]

Authorisation

<table>
<thead>
<tr>
<th>Name</th>
<th>Date</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report prepared by:</td>
<td>Louisa Jones</td>
<td>19.04.17</td>
</tr>
<tr>
<td>Report checked by:</td>
<td>Lindsay Carrington</td>
<td>25.04.17</td>
</tr>
</tbody>
</table>

The contents of this report were correct at the time of the last survey visit. The report is provided for the sole use of the named client and is confidential.

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It is company policy to share species records collected during our surveys with local biological records centres unless instructed otherwise by the client.
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SUMMARY

1. Lindsay Carrington Ecological Services Limited were commissioned by Holbury Consultancy Services Ltd to conduct an ecological appraisal at Bell Lane, Kesgrave, Ipswich, IP5 2HH (Grid Ref: TM 2244 2628) in relation to plans to construct a housing development on the site.

2. An ecological appraisal is essentially a multi-disciplinary walk-over survey and was conducted with the objective of identifying any ecological constraints associated with the proposals such as the site’s potential to support any legally protected species or habitats of high nature conservation value.

3. The site comprised open arable fields with areas of semi-improved grassland, scrub, tall ruderal and a collection of old buildings.

4. The site lies within close proximity to Deben Estuary SPA, Ramsar and SSSI, Stour and Orwell Estuaries SPA and Ipswich Heaths SSSI and Foxhill Stadium Wood CWS. Further recommendations are provided in section 5.1.

5. A badger sett was recorded in an area of dense bracken on the site with an additional sett outside the site boundary within an arable field. Recommendations have been made in section 5.2 regarding badgers.

6. The habitat on the site has been assessed as providing foraging habitat for bats with the buildings and trees providing potential roosts. Further recommendations have been made in section 5.3.

7. The hedgerows and woodland on the site provide potential foraging habitat for dormice with the site having good connectivity to the surrounding area. Further recommendations have been made in section 5.4.

8. The scrub, semi-improved grassland, hedgerow and woodland on the site provide potential terrestrial habitat for great crested newts. In addition, there are two waterbodies within 500 metres of the site and therefore further surveys will be required as detailed in section 5.5.

9. A natterjack toad has been recorded on adjacent heathland and this species may be present on the site. Further recommendations have been made in section 5.6.

10. The gorse on the site has the potential to support silver-studded blue butterflies. Further recommendations have been made in section 5.7.
11. Skylarks and meadow pipits were recorded singing across the site during the ecological appraisal. Both of these species are of conservation interest and are ground nesting species. Further recommendations have been made in section 5.7.

12. The open arable fields provide potential habitat for flocks of wintering birds such as golden plover. Further recommendations have been provided in section 5.8.

13. The semi-improved grassland, scrub and hedgerows on the site provides potential habitat for reptiles with the site having good connectivity to surrounding areas. Reptiles may therefore be present on the site and further recommendations have been made in section 5.9.

14. There are multiple records of hedgehog in the local area and suggestions to enhance the site for this species are provided in section 5.10.

15. Recommendations have been made in section 5.11 to increase the biodiversity value of the site, which includes the planting of native shrubs in any landscaping and providing nesting opportunities for birds and roosting opportunities for bats.
1.0 INTRODUCTION

Lindsay Carrington Ecological Services Limited were commissioned by Holbury Consultancy Services Ltd to conduct an ecological appraisal at Bell Lane, Kesgrave, Ipswich, IP5 2HH (Grid Ref: TM 2244 2628). This survey was undertaken in support of an application to alter the land designation for land at Bell Lane, Kesgrave.

An ecological appraisal is essentially a multi-disciplinary walk-over survey and was conducted with the objective of identifying any ecological constraints associated with the proposals such as the site’s potential to support any legally protected species or habitats of high nature conservation value.

Section 2 of the report provides some background information on legislative requirements and relevant policy. Section 3 details the methodologies adopted for the ecological surveys that were conducted and section 4 provides an account of the survey results. Section 5 provides information on the relevance of the results to the proposed development and makes recommendations for measures to mitigate and compensate for the effects on a particular habitat or species.
2.0 LEGISLATION AND POLICY

2.1 Legislation

The following legislation may be of relevance to the proposed works. Full details of statutory obligations with respect to biodiversity and the planning system can be found in DCLG Circular 06/2005.

- **The Conservation of Habitats and Species Regulations 2010:**
  This transposes the EU Habitats Directive (Council Directive 92/43/EEC) into domestic law. The Regulations provide protection for a number of species including:
  - All species of bat;
  - Dormouse; and
  - Great crested newt.

  This legislation makes it an offence to deliberately capture, kill or injure individuals of these species listed on Schedule 2 and damage or destroy their breeding site or place of shelter. It is also illegal to deliberately disturb these species in such a way as to be likely to significantly affect: (i) the ability of any significant group of the species to survive, breed or rear or nurture their young; or (ii) the local distribution or abundance of the species.\(^1\)

  This legal protection means that where development has the potential to impact on bats, or other European protected species, the results of a protected species survey must be submitted with a planning application.

  Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are also protected under this legislation. These are a network of sites designated for supporting habitats or species of high nature conservation importance in the European context. Any activity that has a detrimental effect on these European sites is made an offence under the Regulations. Where a development is likely to have a significant impact on a European site, the Regulations require a rigorous assessment of the impacts, known as an Appropriate Assessment.

- **The Wildlife and Countryside Act 1981 (and amendments):** Protected fauna and flora are listed under Schedules 1, 5 & 8 of the Act. Species likely to be of relevance include:

  \(^1\) Note that the amendment to the Habitats Regulations in August 2007 and January 2009 has resulted in an increase in the threshold of illegal levels of disturbance to European Protected Species (EPS). An offence is only committed if the deliberate disturbance would result in significant impacts to the EPS population. However, it should be noted that activities that cause low levels of disturbance to these species continue to constitute an offence under Section 9 of the Wildlife and Countryside Act (see below).
o All species of bat. It is an offence to intentionally or recklessly disturb any bat whilst it is occupying a roost or to intentionally or recklessly obstruct access to a bat roost;

o All species of British reptile (in particular grass snake, common lizard, adder and slow-worm). It is illegal to kill or injure these species; and

o Great crested newt. It is illegal to obstruct access to any structure or place which great crested newts use for shelter or protection or to disturb any great crested newt while it is using such a place.

This Act also makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy their eggs and nests (whilst in use or being built). In addition, it is an offence to disturb any nesting bird listed on Schedule 1 or their young.

Schedule 9 of the Act lists those species for which it is an offence to cause their spread. Schedule 9 species that are most likely to be encountered are Japanese knotweed (Fallopia japonica) and New Zealand pigmyweed (Crassula helmsii).

Sites of Special Scientific Interest (SSSIs) are also protected under the Wildlife and Countryside Act 1981. These are a network of sites identified as being of national nature conservation importance and hence afforded legal protection.

- **The Countryside and Rights of Way Act 2000**: This Act strengthens nature conservation and wildlife protection. It places a duty on Government Ministers and Departments to conserve biological diversity, provides police with stronger powers relating to wildlife crimes, and improves protection and management of SSSIs.

- **The Protection of Badgers Act 1992**: This Act makes it an offence to wilfully take, injure or kill a badger (Meles meles); cruelly mistreat a badger; interfere with badger setts. A licence is required for work which may damage or disturb a sett.

- **Wild Mammals (Protection) Act 1996**: This Act provides protection for all wild animals from intentional acts of cruelty.

- **Hedgerow Regulations 1997**: These Regulations establish a set of criteria for assessing the importance of hedgerows. Where a hedgerow is deemed to be ‘important’ its removal is prohibited without consent from the local Planning Authority.
2.2 Policy

The following policy is of relevance to the proposed works:

- **National Planning Policy Framework (NPPF):** This sets out the Government’s vision for biodiversity in England with the broad aim that planning, construction, development and regeneration should maintain and enhance, restore or add to biodiversity and geological conservation interests. NPPF includes sections on legally protected species and sites (see Section 2.1).

- **Local Sites (including Sites of Nature Conservation Interest (SNCIs), Local Nature Reserves (LNR), and Biological Notification Sites (BNSs)/County Wildlife Sites (CWSs)):** These are a network of sites designated for their nature conservation importance in a local context. Although they are not afforded legal protection they contribute towards local and national biodiversity. Where such development is permitted, the local planning authority will use conditions and/or planning obligations to minimise the damage and to provide compensatory and site management measures where appropriate.

- **Biodiversity Action Plans (BAPs):** BAPs set out policy for protecting and restoring priority species and habitats as part of the UK’s response as signatories to the Convention on Biological Diversity. BAPs operate at both a national and local level with priority species and habitats identified at a national level and a series of Local BAPs that identify ecological features of particular importance to a particular area of the country. The requirement to consider and contribute towards BAP targets was strengthened through the Countryside and Rights of Way Act 2000. Habitat and Species Action Plans that are likely to be of relevance include:
  - Great crested newt (UK BAP)
  - Reptiles (UK BAP)
  - Brown long-eared bat (UK BAP)
  - Soprano pipistrelle (UK BAP)
  - Silver-studded blue butterfly (UK BAP)
3.0 METHODOLOGY

3.1 Desk study

Suffolk Biodiversity Information Services (SBIS) provided protected species records within 2 km of the site and details on non-statutory designated sites. The Multi-Agency Geographical Information for the Countryside (MAGIC) website was used to provide any information statutory designated sites within 5 km of the proposed development.

3.2 Field study

3.2.1 Vegetation

The standard Phase 1 habitat survey methodology (JNCC, 2010) was adopted whereby habitats are mapped using colour codes (see Appendix I). A detailed walkover survey was undertaken on 9th March 2017 by Louisa Jones and Liz Kimber, directly searching for legally protected and invasive species of plant and categorising any habitats of ecological value that were encountered. A general description of the vegetation was also noted, listing species encountered and scoring their abundance using the DAFOR scale:

D Dominant;
A Abundant;
F Frequent;
O Occasional;
R Rare;
L Local (used as a prefix to any of the above).

3.2.2 Protected species assessment

Badgers

A direct search was undertaken for signs of badger. Signs of badger may include setts, dung pits, latrines, paths or hairs on fences and vegetation. Any setts encountered were classified according to the number of entrances and the extent of their use.

Bats

Potential for the site to support roosting, foraging and commuting bats was assessed by Louisa Jones (Natural England Class 1 Licence number: 2016-22038-CLS-CLS) and Liz Kimber on the 9th March 2017 in accordance with the Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists Good Practice Guidelines (Collins et al., 2016).
Buildings

A series of building are present in the centre of the site, although access to these was not possible during this initial survey visit.

Trees

Bats often roost in trees. Features such as old woodpecker holes, splits, cavities and rot holes, loose or flaking bark and ivy creepers will be exploited by bats to roost. Any trees present on site were therefore assessed for their potential to support roosting bats by searching for such features. The presence of roosting bats can be spotted through signs such as accumulations of moth or butterfly wings, staining, bat droppings, or bats themselves. The absence of these cannot, however, be treated as conclusive evidence that bats are not present, and therefore an assessment was made of the potential of the trees to support bats based on the scale presented below in Table 1, adapted from the *Good Practice Guidelines* (Collins, 2016):

<table>
<thead>
<tr>
<th>Criteria for assessing bat roosting potential of trees</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>High Roosting Potential</strong></td>
</tr>
<tr>
<td><strong>Moderate Roosting Potential</strong></td>
</tr>
<tr>
<td><strong>Low or Negligible Roosting Potential</strong></td>
</tr>
</tbody>
</table>

Foraging habitat

The site was assessed for its suitability to support foraging bats. Bats will forage on sites that support linear landscape features (e.g. hedgerows, tree lines and rivers) with good habitat connectivity and within proximity to suitable roosting sites. Sites that support a varied vegetation structure are considered to provide more suitable foraging habitat for bats as they support an abundance and diversity of insect prey.

Dormice

The habitat on the site was assessed for the potential to support dormice (*Muscardinus avellanarius*), which are found in habitats such as woodlands, scrub and hedgerows with good connectivity and suitable food plants. A visual inspection for their distinctive nests was undertaken. Satellite images were used to assess the connectivity of any suitable habitat present on the site to other areas of woodland and hedgerow networks.
**Great crested newts**

Suitable breeding ponds are essential to support populations of great crested newt (*Triturus cristatus*) although they actually only spend a relatively short period of the year in the ponds during the spring for breeding. The remainder of the year is spent in suitable ‘foraging’ terrestrial habitat such as tall grassland and woodland. During the winter the great crested newt hibernates, often amongst the roots of trees and scrub or in places such as piles of rubble, amongst foundations of buildings or under fallen trees and logs.

Great crested newts are known to forage up to at least five hundred metres from their breeding pond and suitable habitats that fall within two hundred and fifty metres must be considered even in situations where the breeding pond itself will not be affected. The site and surrounding area was assessed for the presence of ponds that would be suitable breeding habitat for great crested newts during the phase 1 habitat survey. Suitable terrestrial habitat was also assessed.

**Habitat Suitability Index (HSI)**

A Habitat Suitability Index (HSI) assessment was carried out to determine the suitability of water bodies and ponds to support great crested newts. The assessment uses criteria and values as provided by Oldham et al. (2000, 2008). HSI cannot be used to predict the presence of great crested newts.

The results are categorised according the following scale:

- **<0.5 = poor**
- **0.5 – 0.59 = below average**
- **0.6 – 0.69 = average**
- **0.7 – 0.79 = good**
- **>0.8 = excellent**

**Reptiles**

Reptiles are widespread in habitats that provide both cover, in the form of scrub or tall vegetation, and basking areas such as areas of hard standing or short grassland communities. Piles of debris or rubble also provide excellent cover and hibernation sites for reptiles. The site was assessed for any suitable habitat able to support reptile species during the phase 1 habitat survey.
4.0 RESULTS

4.1 Desk study

Statutory and non-statutory sites

Table 2 below lists statutory sites designated for nature conservation located within five kilometres of the site and non-statutory sites within two kilometres.

Table 2: Statutory designated sites within a five kilometres radius and non-statutory sites within a two kilometres radius of land at Bell Lane, Kesgrave

<table>
<thead>
<tr>
<th>Site name</th>
<th>Conservation status</th>
<th>Distance and direction from site (km)</th>
<th>Size (Ha)</th>
<th>Habitat description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deben Estuary</td>
<td>SPA</td>
<td>2.97 north east</td>
<td>978.93</td>
<td>The Deben Estuary is important for its populations of over wintering avocet (Recurvirostra avosetta) and also for its extensive and diverse salt marsh communities.</td>
</tr>
<tr>
<td>Ramsar</td>
<td></td>
<td>2.97 north east</td>
<td></td>
<td>Designated for Ramsar criterion 3c, the site supports an internationally important over wintering population of dark-bellied brent geese (Branta bernicla bernicla). Notable also are nationally important number of migratory species including shelduck (Tadorna tadorna), avocet, grey plover (Pluvialis squatarola), black tailed godwit (Limosa limosa) and redshank (Tringa totanus).</td>
</tr>
</tbody>
</table>

SPA: Special Protection Area
<table>
<thead>
<tr>
<th>Site name</th>
<th>Conservation status</th>
<th>Distance and direction from site (km)</th>
<th>Size (Ha)</th>
<th>Habitat description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSSI³</td>
<td>2.97 north east</td>
<td>3672.64</td>
<td></td>
<td>Designated for both breeding and over wintering populations of redshank. The site is also designated for nationally important over wintering populations of dark-bellied brent geese, shelduck and black-tailed godwit.</td>
</tr>
<tr>
<td>Stour and Orwell Estuaries</td>
<td>SPA</td>
<td>4.51 south west</td>
<td></td>
<td>The Stour and Orwell estuaries comprise extensive mud-flats, low cliffs, saltmarsh and small areas of vegetated shingle on the lower reaches. The site is designated for important over wintering populations of numerous bird species including hen harrier (<em>Circus cyaneus</em>), black-tailed godwit, grey plover, pintail (<em>Anas acuta</em>), ringed plover (<em>Charadrius hiaticula</em>) and turnstone (<em>Arenaria interpres</em>).</td>
</tr>
<tr>
<td>Ipswich Heaths</td>
<td>SSSI</td>
<td>0.01 east</td>
<td>39.43</td>
<td>Martlesham and Purdis Heaths are remnants of extensive heathland. Both contain areas of heather (<em>Calluna vulgaris</em>) heath and acid grassland, together with stands of bracken (<em>Pteridium aquilinum</em>) and gorse (<em>Ulex europaeus</em>) scrub forming a mosaic of habitats of particular value for butterflies. Motolesham Heath is notable for supporting the largest colony of the silver-studded blue butterfly in East Anglia.</td>
</tr>
<tr>
<td>Sinks Valley</td>
<td>SSSI</td>
<td>1.2 km north</td>
<td>24.89</td>
<td>The site comprises semi-natural vegetation, including ponds important for amphibians, the nationally important scarce plant, mossy stonecrop (<em>Crassula tillaea</em>) and locally significant <em>Sphagnum</em> mosses.</td>
</tr>
<tr>
<td>Site name</td>
<td>Conservation status</td>
<td>Distance and direction from site (km)</td>
<td>Size (Ha)</td>
<td>Habitat description</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------</td>
<td>--------------------------------------</td>
<td>-----------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Bixley Heath</td>
<td>SSSI</td>
<td>1.3 south west</td>
<td>5.08</td>
<td>Bixley Heath is important for its dwarf heathland which occurs with lowland fen, marsh and swamp. The presence of these two habitat types within a single site is a particularly rare feature in the Suffolk Sandlings.</td>
</tr>
<tr>
<td>Waldringfield Pit</td>
<td>SSSI</td>
<td>2.5 east</td>
<td>0.08</td>
<td>Waldringfield Pit is a quaternary geological locality important for a sequence of Middle Pleistocene deposits.</td>
</tr>
<tr>
<td>Newbourn Springs</td>
<td>SSSI</td>
<td>2.9 south east</td>
<td>15.7</td>
<td>Newbourn Springs is a small site containing a variety of habitats in close juxtaposition. The major part of the site comprises a narrow spring-flushed valley occupied by a fast flowing stream with alder and small areas of fen on peat overlying London Clay. Drier more acidic soils above the stream valley support broad-leaved woodland, scrub, grassland communities and bracken dominated heath. Rich and varied flora and diversity of habitats attracts good populations of breeding and migratory birds.</td>
</tr>
<tr>
<td>Orwell Estuary</td>
<td>SSSI</td>
<td>4 south</td>
<td>1335.53</td>
<td>The Orwell Estuary is of national importance for breeding avocet (<em>Recurvirostra avosetta</em>), its breeding bird assemblage of open waters and their margins, nine species of wintering waterfowl including black-tailed godwit and assemblage of vascular plants, and intertidal mud habitats.</td>
</tr>
<tr>
<td>Site name</td>
<td>Conservation status</td>
<td>Distance and direction from site (km)</td>
<td>Size (Ha)</td>
<td>Habitat description</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------</td>
<td>--------------------------------------</td>
<td>-----------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Nacton Meadows</td>
<td>SSSI</td>
<td>4.1 south</td>
<td>4.47</td>
<td>Nacton Meadows are of special interest for their areas of fen-meadow, very scarce in Suffolk. The site supports a relatively species-rich version of the vegetation community type compared to the other sites in the County.</td>
</tr>
<tr>
<td>Bixley Heath</td>
<td>LNR&lt;sup&gt;4&lt;/sup&gt;</td>
<td>1.3 south west</td>
<td>5.08</td>
<td>Bixley Heath is important for its heathland which occurs here in association with a scarce swamp vegetation. The presence of these two habitat types within a single site is a particularly rare feature in the Suffolk Sandlings which have been greatly fragmented and reduced in area during recent decades</td>
</tr>
<tr>
<td>Bridgewood</td>
<td>LNR</td>
<td>4.6 south</td>
<td>30.99</td>
<td>Ancient woodland, with a number of magnificent old oak trees, many hundreds of years old. It also contains some 1950s pine plantation, which is gradually being thinned to create more traditional mixed woodland.</td>
</tr>
<tr>
<td>Pipers Vale</td>
<td>LNR</td>
<td>5 south west</td>
<td>19.67</td>
<td>A variety of habitats including heath, scrub, reed beds and alder carr supporting a number of uncommon plants including sulphur cinquefoil, hemlock water-dropwort and meadow-rue. These habitats also support more than 100 bird species including redwing, whimbrel and bullfinch.</td>
</tr>
</tbody>
</table>

<sup>4</sup> LNR: Local Nature Reserve
<table>
<thead>
<tr>
<th>Site name</th>
<th>Conservation status</th>
<th>Distance and direction from site (km)</th>
<th>Size (Ha)</th>
<th>Habitat description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foxhall Stadium Wood</td>
<td>CWS(^5)</td>
<td>0.01 west</td>
<td>46.06</td>
<td>Foxhall Stadium Wood is a sizeable woodland developed from heathland; remnants of this heathland can be seen on the western edge of the wood. Nightingales (Luscinia megarhynchos) and warblers have been seen here in good numbers.</td>
</tr>
<tr>
<td>Martlesham Heath Wood</td>
<td>CWS</td>
<td>0.5 east</td>
<td>12.59</td>
<td>Located within the residential development of Martlesham Heath Village, this woodland site is of considerable value both as an amenity woodland and for wildlife. Vegetation types include a birch (Betula) woodland of 30-40 year old trees, these are mostly self-sown with some regrowth from stools. The woodland also has occasional oak (Quercus) and Scot’s pine (Pinus sylvestris) with mainly bracken (Pteridium aquilinum) under the trees.</td>
</tr>
<tr>
<td>The Mill River</td>
<td>CWS</td>
<td>1.2 south</td>
<td>5.5</td>
<td>This priority habitat rises in ‘The Mount’ CWS on the outskirts of Ipswich and flows into the River Deben estuary at Kirton creek. This sinuous watercourse flows through a diverse landscape including wet woodland, in the form of alder carr and flower-rich grazing meadows which are UK BAP Priority Habitats.</td>
</tr>
</tbody>
</table>

\(^5\) CWS: County Wildlife Site
<table>
<thead>
<tr>
<th>Site name</th>
<th>Conservation status</th>
<th>Distance and direction from site (km)</th>
<th>Size (Ha)</th>
<th>Habitat description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ipswich Golf Course</td>
<td>CWS</td>
<td>1.7 south west</td>
<td>88.48</td>
<td>Ipswich Golf Course has been developed on an area of heathland known as the Suffolk Sandlings, which at one time bordered the length of the Suffolk coastline. Remnant heathland, consisting of heather and gorse scrub fringe the fairways providing a valuable refuge for many heathland species which are declining elsewhere.</td>
</tr>
<tr>
<td>The Mount</td>
<td>CWS</td>
<td>1.7 south east</td>
<td>23.27</td>
<td>This site is a mosaic of habitats associated with a tributary of the Mill River. Originating from springs near Tower Farm, the watercourse runs southwards through a wooded valley where it is joined by a tributary from the decoy ponds at Purdis.</td>
</tr>
<tr>
<td>Kesgrave Wood/ Sinks Valley</td>
<td>CWS</td>
<td>1.7 north</td>
<td>19.32</td>
<td>Kesgrave Wood (covered by a Tree Preservation Order) is an early 19th century plantation which has subsequently been considerably augmented by natural regeneration.</td>
</tr>
<tr>
<td>Valley Farm Meadow</td>
<td>CWS</td>
<td>1.9 south east</td>
<td>1.02</td>
<td>A small area of wet grassland, situated adjacent to the River Mill between the A12 embankment and Valley Farm (now derelict).</td>
</tr>
</tbody>
</table>

The Ipswich Heaths SSSI and Foxhill Stadium Wood CWS are located adjacent to the eastern and western boundaries of the site, whilst the Deben Estuary SPA, Ramsar and SSSI lies 2.8 kilometres to the north east of the site, and the Stour and Orwell Estuaries SPA is located 4.51 kilometres to the south west of the site. Further recommendations have therefore been made in section 5.1.

**Protected species records**

Records of protected species within a two kilometre radius of the site were collected from Suffolk Biodiversity Information Services and are presented in table 3 below.
Table 3: Protected and notable species within a two kilometre radius of Bell Lane, Kesgrave

<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific name</th>
<th>Status</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Amphibians and reptiles</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slow worm</td>
<td><em>Anguis fragilis</em></td>
<td>Schedule 5 WCA(^6), UKBAP(^7)</td>
<td>17 records dated between 2000 and 2015</td>
</tr>
<tr>
<td>Common toad</td>
<td><em>Bufo bufo</em></td>
<td>Schedule 5 WCA, UKBAP</td>
<td>12 records dated between 1996 and 2014</td>
</tr>
<tr>
<td>Natterjack toad</td>
<td><em>Epidalea calamita</em></td>
<td>Schedule 5 WCA, Schedule 2 Habs Regs, UKBAP</td>
<td>1 record dated 2010</td>
</tr>
<tr>
<td>Smooth newt</td>
<td><em>Lissotriton vulgaris</em></td>
<td>Schedule 5 WCA, UKBAP</td>
<td>7 records dated between 2007 and 2014</td>
</tr>
<tr>
<td>Grass snake</td>
<td><em>Natrix natrix</em></td>
<td>Schedule 5 WCA</td>
<td>3 records dated between 2007 and 2011</td>
</tr>
<tr>
<td>Great crested newt</td>
<td><em>Triturus cristatus</em></td>
<td>Schedule 5 WCA, Schedule 2 Habs Regs, UKBAP</td>
<td>2 records dated 2004 and 2008</td>
</tr>
<tr>
<td>Adder</td>
<td><em>Vipera berus</em></td>
<td>Schedule 5 WCA, UKBAP</td>
<td>22 records dated between 2001 and 2012.</td>
</tr>
<tr>
<td>Common lizard</td>
<td><em>Zootoca vivipara</em></td>
<td>Schedule 5 WCA, UKBAP</td>
<td>18 records dated between 2000 and 2012.</td>
</tr>
<tr>
<td><strong>Birds</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lesser redpoll</td>
<td><em>Acanthis cabaret</em></td>
<td>Amber List BoCC(^8)</td>
<td>6 records dated between 2007 and 2011</td>
</tr>
<tr>
<td>Common redpoll</td>
<td><em>Acanthis flammea</em></td>
<td>Amber List BoCC</td>
<td>6 records dated between 2009 and 2013</td>
</tr>
<tr>
<td>Kingfisher</td>
<td><em>Alcedo atthis</em></td>
<td>Schedule 1, Annex 1, Amber List BoCC</td>
<td>5 records dated between 2008 and 2011</td>
</tr>
<tr>
<td>Pintail</td>
<td><em>Anas acuta</em></td>
<td>Amber List BoCC</td>
<td>1 record from 2007</td>
</tr>
<tr>
<td>Greylag goose</td>
<td><em>Anser anser</em></td>
<td>Amber List BoCC</td>
<td>3 records dated between 2009 and 2011</td>
</tr>
<tr>
<td>Swift</td>
<td><em>Apus apus</em></td>
<td>Amber List BoCC</td>
<td>13 records dated between 2008 to 2014</td>
</tr>
<tr>
<td>Purple heron</td>
<td><em>Ardea purpurea</em></td>
<td>Schedule 1 WCA, Annex 1</td>
<td>1 record dated 2008</td>
</tr>
<tr>
<td>Dunlin</td>
<td><em>Calidris alpina</em></td>
<td>Amber List BoCC</td>
<td>1 record dated 2010</td>
</tr>
<tr>
<td>Curlew</td>
<td><em>Calidris ferruginea</em></td>
<td>Red List BoCC, UK BAP</td>
<td>2 records dated 2008 and 2009</td>
</tr>
</tbody>
</table>

\(^6\) WCA: The Wildlife and Countryside Act 1981 (as amended)
\(^7\) UKBAP: UK Biodiversity Action Plan
\(^8\) BoCC: Birds of Conservation Concern v.4
<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific name</th>
<th>Status</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nightjar</td>
<td><em>Caprimulgus europaeus</em></td>
<td>Annex 1, Amber List BoCC, UK BAP</td>
<td>2 records dated 2010 and 2014.</td>
</tr>
<tr>
<td>Cetti's warbler</td>
<td><em>Cettia cetti</em></td>
<td>Schedule 1 WCA</td>
<td>2 records dated 2010 and 2011.</td>
</tr>
<tr>
<td>Cuckoo</td>
<td><em>Cuculus canorus</em></td>
<td>Red List BoCC, UK BAP</td>
<td>10 records dated between 2008 and 2015.</td>
</tr>
<tr>
<td>Bewick's swan</td>
<td><em>Cygnus columbianus</em></td>
<td>Schedule 1 WCA, Annex 1, Amber List BoCC, UK BAP</td>
<td>1 record dated 2014</td>
</tr>
<tr>
<td>Lesser-spotted woodpecker</td>
<td><em>Dendrocopos minor</em></td>
<td>Red List BoCC, UK BAP</td>
<td>2 records dated 2008 and 2009</td>
</tr>
<tr>
<td>Reed bunting</td>
<td><em>Emberiza schoeniclus</em></td>
<td>Amber List BoCC, UK BAP</td>
<td>3 records dated between 2008 and 2011.</td>
</tr>
<tr>
<td>Merlin</td>
<td><em>Falco columbarius</em></td>
<td>Schedule 1 WCA, Annex 1, Red List BoCC</td>
<td>1 record dated 2009</td>
</tr>
<tr>
<td>Peregrine</td>
<td><em>Falco peregrinus</em></td>
<td>Schedule 1 WCA, Annex 1, Red List BoCC</td>
<td>1 record dated 2009</td>
</tr>
<tr>
<td>Hobby</td>
<td><em>Falco subbuteo</em></td>
<td>Schedule 1 WCA</td>
<td>8 records dated between 2008 and 2013.</td>
</tr>
<tr>
<td>Brambling</td>
<td><em>Fringilla montifringilla</em></td>
<td>Schedule 1 WCA</td>
<td>7 records dated between 2007 and 2014.</td>
</tr>
<tr>
<td>Black-tailed godwit</td>
<td><em>Limosa limosa</em></td>
<td>0</td>
<td>1 record dated 2011</td>
</tr>
<tr>
<td>Common crossbill</td>
<td><em>Loxia curvirostra</em></td>
<td>Schedule 1 WCA</td>
<td>3 records dated between 2009 and 2012.</td>
</tr>
<tr>
<td>Red kite</td>
<td><em>Milvus milvus</em></td>
<td>Schedule 1 WCA, Annex 1, Amber List BoCC</td>
<td>4 records dated between 2009 and 2013.</td>
</tr>
<tr>
<td>Common Name</td>
<td>Scientific name</td>
<td>Status</td>
<td>Dates</td>
</tr>
<tr>
<td>------------------</td>
<td>-------------------------</td>
<td>---------------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>Yellow wagtail</td>
<td>Motacilla flava</td>
<td>Red List BoCC, UK BAP</td>
<td>2 records dated 2008</td>
</tr>
<tr>
<td>Spotted flycatcher</td>
<td>Muscicapa striata</td>
<td>Red List BoCC, UK BAP</td>
<td>2 records dated between 2009 and 2010.</td>
</tr>
<tr>
<td>Curlew</td>
<td>Numenius arquata</td>
<td>Red List BoCC, UK BAP</td>
<td>1 record dated 2011</td>
</tr>
<tr>
<td>Osprey</td>
<td>Pandion haliaetus</td>
<td>Schedule 1 WCA, Annex 1, Amber List BoCC</td>
<td>1 records dated 2013</td>
</tr>
<tr>
<td>Bearded tit</td>
<td>Panurus biarmicus</td>
<td>Schedule 1</td>
<td>1 record dated 2011</td>
</tr>
<tr>
<td>Grey partridge</td>
<td>Perdix perdix</td>
<td>Red List BoCC, UK BAP</td>
<td>1 record dated 2002</td>
</tr>
<tr>
<td>Honey buzzard</td>
<td>Pernis apivorus</td>
<td>Schedule 1 WCA, Annex 1, Amber List BoCC</td>
<td>1 record dated 2014</td>
</tr>
<tr>
<td>Black redstart</td>
<td>Phoenicurus ochruros</td>
<td>Schedule 1 WCA, RED List BoCC</td>
<td>2 records dated 2010</td>
</tr>
<tr>
<td>Marsh tit</td>
<td>Poecile palustris</td>
<td>Red List BoCC, UK BAP</td>
<td>1 record dated 2010</td>
</tr>
<tr>
<td>Dunnock</td>
<td>Prunella modularis</td>
<td>Amber List BoCC, UK BAP</td>
<td>65 records dated between 2009 and 2014.</td>
</tr>
<tr>
<td>Bullfinch</td>
<td>Pyrrhula pyrrhula</td>
<td>Amber List BoCC, UK BAP</td>
<td>15 records dated between 2000 and 2013</td>
</tr>
<tr>
<td>Avocet</td>
<td>Recurvirostra avosetta</td>
<td>Schedule 1, Annex 1, Amber List BoCC</td>
<td>1 record dated 2010</td>
</tr>
<tr>
<td>Turtle dove</td>
<td>Streptopelia turtur</td>
<td>Red List BoCC, UK BAP</td>
<td>11 records dated between 1997 and 2011</td>
</tr>
<tr>
<td>Tawny owl</td>
<td>Strix aluco</td>
<td>Amber List BoCC</td>
<td>9 records dated between 2008 and 2010</td>
</tr>
<tr>
<td>Starling</td>
<td>Sturnus vulgaris</td>
<td>Red List BoCC, UK BAP</td>
<td>103 records dated between 2007 and 2014.</td>
</tr>
<tr>
<td>Dartford warbler</td>
<td>Sylvia undata</td>
<td>Schedule 1 WCA, Amber List BoCC</td>
<td>2 records dated 2008</td>
</tr>
<tr>
<td>Shelduck</td>
<td>Tadorna tadorna</td>
<td>Amber List BoCC</td>
<td>Records dated between 2008 and 2010</td>
</tr>
<tr>
<td>Greenshank</td>
<td>Tringa nebularia</td>
<td>Schedule 1, Amber List BoCC</td>
<td>1 record dated 2009</td>
</tr>
<tr>
<td>Redwing</td>
<td>Turdus iliacus</td>
<td>Schedule 1 WCA, Red List BoCC</td>
<td>17 records dated between 2008 and 2014.</td>
</tr>
<tr>
<td>Song thrush</td>
<td>Turdus philomelos</td>
<td>Red List BoCC, UK BAP</td>
<td>27 records dated between 2002 and 2014.</td>
</tr>
<tr>
<td>Common Name</td>
<td>Scientific name</td>
<td>Status</td>
<td>Dates</td>
</tr>
<tr>
<td>-------------</td>
<td>-----------------------</td>
<td>-------------------------------------------</td>
<td>----------------------------</td>
</tr>
<tr>
<td>Fieldfare</td>
<td><em>Turdus pilaris</em></td>
<td>Schedule 1, Red List BoCC</td>
<td>13 records dated 2007 to 2014</td>
</tr>
<tr>
<td>Barn owl</td>
<td><em>Tyto alba</em></td>
<td>Schedule 1 WCA</td>
<td>5 records dated between 2009 and 2010</td>
</tr>
<tr>
<td>Lapwing</td>
<td><em>Vanellus vanellus</em></td>
<td>Red List BoCC, UK BAP</td>
<td>8 records dated between 2008 and 2010</td>
</tr>
<tr>
<td><strong>Mammals – bats</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Serotine</td>
<td><em>Eptesicus serotinus</em></td>
<td>Schedule 2 Habs Regs, Schedule 5 WCA</td>
<td>4 records dated between 2009 and 2014</td>
</tr>
<tr>
<td>Common pipistrelle</td>
<td><em>Pipistrellus pipistrellus</em></td>
<td>Schedule 2 Habs Regs, Schedule 5 WCA</td>
<td>21 records dated 2014.</td>
</tr>
<tr>
<td>Soprano pipistrelle</td>
<td><em>Pipistrellus pygmaeus</em></td>
<td>Schedule 2 Habs Regs, Schedule 5 WCA, UK BAP</td>
<td>8 records dated 2014.</td>
</tr>
<tr>
<td>Brown long-eared bat</td>
<td><em>Plecotus auritus</em></td>
<td>Schedule 2 Habs Regs, Schedule 5 WCA, UK BAP</td>
<td>5 records dated between 2003 and 2013</td>
</tr>
<tr>
<td><strong>Mammals – Terrestrial (non-bats)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water vole</td>
<td><em>Arvicola amphibius</em></td>
<td>Schedule 5 WCA, UK BAP</td>
<td>7 records dated between 1997 and 2006</td>
</tr>
<tr>
<td>Brown hare</td>
<td><em>Lepus europaeus</em></td>
<td>UK BAP</td>
<td>2 records in 2002 and 2003</td>
</tr>
<tr>
<td>Harvest mouse</td>
<td><em>Micromys minutus</em></td>
<td>UK BAP</td>
<td>3 records between 1998 and 2015</td>
</tr>
<tr>
<td><strong>Invertebrates (Coleopteran)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stag beetle</td>
<td><em>Lucanus cervus</em></td>
<td>UK BAP</td>
<td>5 records dated between 2002 and 2007</td>
</tr>
</tbody>
</table>
Common Name | Scientific name | Status | Dates
---|---|---|---
Invertebrates (Lepidoptera) | | | |
Small heath | *Coenonympha pamphilus* | UK BAP | 12 records dated between 2004 and 2015
Silver-studded blue | *Plebejus argus* | UKBAP, Schedule 5 | 20 records dated between 1996 and 2015
White-letter hairstreak | *Satyrium w-album* | UKBAP, Schedule 5 | 11 records dated between 1998 and 2015

These records of protected and notable species in the vicinity of the site increase the likelihood of them being present where suitable habitat is identified in the field survey.

### 4.2 Field survey

#### 4.2.1 Vegetation

The accompanying Phase 1 habitat map provided as Appendix I depicts the habitats encountered and highlights areas of particular interest with target notes. The site predominantly comprises arable land with areas of semi-improved grassland, scrub, bare ground and areas of broadleaved woodland.

Descriptions of these habitats are provided below:

**Buildings (Target note 1)**

The centre of the site comprises an aviation museum and disused buildings with a total of four buildings present on the site.

The buildings provide potential for bats and breeding birds which is discussed further in section 4.2.2.

**Hardstanding (Target note 2)**

Area of hardstanding are present which form the roads into the site. These were in good condition at the time of the survey and were unvegetated.

This habitat has no ecological value and no further action is required.

**Bareground (Target note 3)**

An area of bare ground is present along the western boundary of the site and has been formed by vehicles driving on the site.

This habitat has no ecological value and no further action is required.
Arable land (Target note 4)

The majority of the site comprises arable land with a perennial rye-grass (*Lolium perenne*) crop and areas that had been recently ploughed or left fallow.

Species present are common and widespread. The habitat provides potential breeding habitat and over-wintering habitat for arable bird species. This is discussed further in section 4.2.2.

Fallow field (Target note 5)

One of the fields has been left fallow and has partially been colonised by vegetation. Species present includes locally occasional cat’s-ear (*Hypochaeris radicata*), occasional common ragwort (*Senecio jacobaea*) and common nettle (*Urtica dioica*). A complete list of species present is provided in table 4 below:

### Table 4: Plant species recorded within the fallow field

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cock’s-foot</td>
<td><em>Dactylis glomerata</em></td>
<td>O</td>
<td>Abundant in meadows, woods, marshes &amp; waste ground</td>
</tr>
<tr>
<td>Red fescue</td>
<td><em>Festuca rubra</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wavy bitter-cress</td>
<td><em>Cardamine flexuosa</em></td>
<td>LO</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common mouse-ear</td>
<td><em>Cerastium fontanum</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cleavers</td>
<td><em>Galium aparine</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Dove’s-foot crane’s-bill</td>
<td><em>Geranium molle</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cat’s-ear</td>
<td><em>Hypochaeris radicata</em></td>
<td>LO</td>
<td>Common in meadows, grasslands, not usually on very calcareous soils</td>
</tr>
<tr>
<td>Common mallow</td>
<td><em>Malva sylvestris</em></td>
<td>F</td>
<td>Common on roadsides, wasteland &amp; hedgebanks</td>
</tr>
<tr>
<td>Common ragwort</td>
<td><em>Senecio jacobaea</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>European gorse</td>
<td><em>Ulex europaeus</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common nettle</td>
<td><em>Urtica dioica</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present are common and widespread. The habitat provides potential breeding habitat for arable bird species. This is discussed further in section 4.2.2.

Amenity grassland (Target note 6)

Areas of short sward amenity grassland are present around the old airfield buildings. Species present in these areas comprise locally dominant daisy (*Bellis perennis*) and
dominant perennial rye-grass with frequent yarrow (*Achillea millefolium*). A list of species present is shown in table 6.

**Table 5: Plant species recorded within the amenity grassland**

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Red fescue</td>
<td>Festuca rubra</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Perennial rye-grass</td>
<td>Lolium perenne</td>
<td>D</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yarrow</td>
<td>Achillea millefolium</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Daisy</td>
<td>Bellis perennis</td>
<td>LD</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Spear thistle</td>
<td>Cirsium vulgare</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Dove’s-foot crane’s-bill</td>
<td>Geranium molle</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cat’s-ear</td>
<td>Hypochaeris radicata</td>
<td>F</td>
<td>Common in meadows, grasslands, not usually on very calcareous soils</td>
</tr>
<tr>
<td>Spotted medic</td>
<td>Medicago arabica</td>
<td>LA</td>
<td>Common on dry open sandy grassland</td>
</tr>
<tr>
<td>Broad-leaved dock</td>
<td>Rumex obtusifolius</td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common ragwort</td>
<td>Senecio jacobaea</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Trefoil sp.</td>
<td>Trifolium sp.</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present are common and widespread and no further action is required.

**Semi-improved grassland (Target note 7)**

A large area of semi-improved grassland is present in the south west of the site. This area has previously been used as arable land and has been left unmanaged and a grassland has developed. Species recorded include frequent cock’s-foot (*Dactylis glomerata*), perennial rye-grass, with occasional ribwort plantain (*Plantago lanceolata*) and red dead-nettle (*Lamium purpureum*). A full species list is provided in table 6 below.

**Table 6: Plant species recorded within the semi-improved grassland.**

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pampas grass</td>
<td>Cortaderia selloana</td>
<td>R</td>
<td>Introduced, common on sandy soils</td>
</tr>
<tr>
<td>Cock’s-foot</td>
<td>Dactylis glomerata</td>
<td>F</td>
<td>Abundant in meadows, woods, marshes &amp; waste ground</td>
</tr>
<tr>
<td>Yorkshire-fog</td>
<td>Holcus lanatus</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Perennial rye-grass</td>
<td>Lolium perenne</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common name</td>
<td>Latin name</td>
<td>Abundance</td>
<td>Status</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------</td>
<td>-----------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>Rough meadow-grass</td>
<td><em>Poa trivialis</em></td>
<td>LP</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yarrow</td>
<td><em>Achillea millefolium</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Creeping thistle</td>
<td><em>Cirsium arvense</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Spear thistle</td>
<td><em>Cirsium vulgare</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Willowherb sp.</td>
<td><em>Epilobium sp.</em></td>
<td>LF</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cleavers</td>
<td><em>Galium aparine</em></td>
<td></td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Dove’s-foot crane’s-bill</td>
<td><em>Geranium molle</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cat’s-ear</td>
<td><em>Hypochaeris radicata</em></td>
<td>LF</td>
<td>Common in meadows, grasslands, not usually on very calcareous soils</td>
</tr>
<tr>
<td>Red dead-nettle</td>
<td><em>Lamium purpureum</em></td>
<td>O</td>
<td>Common on arable, wasteland &amp; hedgebanks</td>
</tr>
<tr>
<td>Ribwort plantain</td>
<td><em>Plantago lanceolata</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Creeping cinquefoil</td>
<td><em>Potentilla reptans</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Bramble</td>
<td><em>Rubus fruticosus agg.</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common ragwort</td>
<td><em>Senecio jacobaea</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Red clover</td>
<td><em>Trifolium pratense</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>European gorse</td>
<td><em>Ulex europaeus</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common nettle</td>
<td><em>Urtica dioica</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Vetch sp.</td>
<td><em>Vicia sp.</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Trees and shrubs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oak saplings</td>
<td><em>Quercus sp.</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Willow saplings</td>
<td><em>Salix sp.</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present within the semi-improved grassland are common and widespread. This has potential to support reptiles, great crested newts, badgers and breeding birds which is discussed further in section 4.2.2.

**Semi-improved grassland (Target note 8)**

A second area of semi-improved grassland is present to the east of old aviation buildings. This area is of different composition to the arable grassland area and forms tussocky grassland with areas of sparse ling heather colonising the area. This grassland area appears more established than that within the arable field area. The area is intercut with amenity pathways and patches of gorse scrub. A full list of species present is provided in table 7 below.

**Table 7: Plant species recorded within the semi-improved grassland.**

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Common bent</td>
<td><em>Agrostis capillaris</em></td>
<td>F</td>
<td>Common on dry acid grasslands</td>
</tr>
</tbody>
</table>

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Lindsay Carrington Ecological Services Ltd
April 2017
<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cock’s-foot</td>
<td>Dactylis glomerata</td>
<td>F</td>
<td>Abundant in meadows, woods, marshes &amp; waste ground</td>
</tr>
<tr>
<td>Yorkshire-fog</td>
<td>Holcus lanatus</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Perennial rye-grass</td>
<td>Lolium perenne</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Rough meadow-grass</td>
<td>Poa trivialis</td>
<td>LP</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td></td>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yarrow</td>
<td>Achillea millefolium</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cow parsley</td>
<td>Anthriscus sylvestris</td>
<td>O</td>
<td>Common on roadsides, hedgebanks &amp; woodland borders</td>
</tr>
<tr>
<td>Ling heather</td>
<td>Calluna vulgaris</td>
<td>LO</td>
<td>Common on heathland, bogs, upland moors &amp; open woodlands on acid soils</td>
</tr>
<tr>
<td>Dove’s-foot crane’s-bill</td>
<td>Geranium molle</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Herb-Robert</td>
<td>Geranium robertianum</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Cat’s-ear</td>
<td>Hypochaeris radicata</td>
<td>LF</td>
<td>Common in meadows, grasslands, not usually on very calcareous soils</td>
</tr>
<tr>
<td>Common mallow</td>
<td>Malva sylvestris</td>
<td>O</td>
<td>Common on roadsides, wasteland &amp; hedgebanks</td>
</tr>
<tr>
<td>Ribwort plantain</td>
<td>Plantago lanceolata</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Creeping cinquefoil</td>
<td>Potentilla reptans</td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Selfheal</td>
<td>Prunella vulgaris</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Creeping buttercup</td>
<td>Ranunculus repens</td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present within the semi-improved grassland are common and widespread. This has potential to support reptiles, great crested newts, badgers and breeding birds which is discussed further in section 4.2.2.

**Improved field margin (Target note 9)**

This area is dominated by perennial rye-grass with frequently occurring red fescue (*Festuca rubra*) and occasional common ragwort and ribwort plantain.

Species present are common and widespread and no further action is required.

**Broad-leaved woodland strip (Target note 10)**

A strip of broad-leaved woodland separates two sections of arable field. This woodland has minimal understorey with occasional bramble (*Rubus fruticosus agg.*) and frequent ivy (*Hedera helix*) and the canopy is dominated by willow species (*Salix Sp.*). The strip is approximately ten metres in width. A full list of species present is provided in table 8.
Table 8: Plant species recorded within the broad-leaved woodland strip

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bracken</td>
<td><em>Pteridium aquilinum</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ivy</td>
<td><em>Hedera helix</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Rose sp.</td>
<td><em>Rosa sp.</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Bramble</td>
<td><em>Rubus fruticosus agg.</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Trees and shrubs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Willow sp.</td>
<td><em>Salix sp.</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Beech</td>
<td><em>Fagus sylvatica</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Sycamore</td>
<td><em>Acer pseudoplatanus</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present are common and widespread. The woodland provides potential habitat for badgers, dormice, great crested newts, bats, breeding birds and reptiles. This is discussed further in section 4.2.2.

Broad-leaved woodland (Target note 11)

An area of broad-leaved woodland is present along the eastern edge of the site. This area of woodland comprises trees of a mixture of ages with a dense understorey of bracken and bramble. Species present include pedunculate oak (*Quercus robur*) and silver birch (*Betula pendula*). Species present in the understorey includes honeysuckle (*Lonicera periclymenum*), bracken and common nettle (*Urtica dioica*). The full list of species is provided in table 9.

Table 9: Plant species recorded within the broad-leaved woodland

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Perennial rye-grass</td>
<td><em>Lolium perenne</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Bracken</td>
<td><em>Pteridium aquilinum</em></td>
<td>LD</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cleavers</td>
<td><em>Galium aparine</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Honeysuckle</td>
<td><em>Lonicera periclymenum</em></td>
<td>F</td>
<td>Common &amp; widespread, mostly on acid soils</td>
</tr>
<tr>
<td>Bramble</td>
<td><em>Rubus fruticosus agg.</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>European gorse</td>
<td><em>Ulex europaeus</em></td>
<td>LD</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common nettle</td>
<td><em>Urtica dioica</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Trees and shrubs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silver birch</td>
<td><em>Betula pendula</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Oak sp.</td>
<td><em>Quercus sp.</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>
Species present are common and widespread. The woodland provides potential habitat for badgers, dormice, great crested newts, bats, breeding birds and reptiles. This is discussed further in section 4.2.2.

**Mixed plantation woodland (Target note 12)**

Mixed plantation woodland is present along the south eastern edge of the site. This woodland area comprises occasional sycamore (*Acer pseudoplatanus*) and sweet chestnut (*Castana sativa*) with frequent Scot’s pine (*Pinus sylvestris*). The understorey is sparse with frequent rough meadow-grass (*Poa trivialis*) and locally dominant bramble. A full list of species present is provided in table 10.

### Table 10: Plant species recorded within the mixed plantation woodland

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cock’s foot</td>
<td><em>Dactylis glomerata</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Rough meadow-grass</td>
<td><em>Poa trivialis</em></td>
<td>F</td>
<td>Abundant in meadows, woods, marshes &amp; waste ground</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Holly</td>
<td><em>Ilex aquifolium</em></td>
<td>O</td>
<td>Common on drier soils</td>
</tr>
<tr>
<td>Bramble</td>
<td><em>Rubus fruticosus agg.</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Trees and shrubs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sycamore</td>
<td><em>Acer pseudoplatanus</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Silver birch</td>
<td><em>Betula pendula</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Sweet chestnut</td>
<td><em>Castana sativa</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Scot’s pine</td>
<td><em>Pinus sylvestris</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Pendunculate oak</td>
<td><em>Quercus robur</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
</tbody>
</table>

Species present are common and widespread. The woodland provides potential habitat for badgers, dormice, great crested newts, bats, breeding birds and reptiles. This is discussed further in section 4.2.2.

**Hedgerow (Target note 13)**

A hedgerow was present on the northern boundary of the arable land. The field margins are very narrow, and the hedgerow is separated from some of the arable land by a wooden fence. A full species list is provided in table 11 below:

### Table 11: Plant species recorded within the hedgerow

<table>
<thead>
<tr>
<th>Common name</th>
<th>Latin name</th>
<th>Abundance</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grasses, ferns and mosses</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Perennial rye-grass</td>
<td><em>Lolium perenne</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Common name</td>
<td>Latin name</td>
<td>Abundance</td>
<td>Status</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------</td>
<td>-----------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td><strong>Herbaceous plants</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cleavers</td>
<td><em>Galium aparine</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Ivy</td>
<td><em>Hedera helix</em></td>
<td>LD</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Holly</td>
<td><em>Ilex aquifolium</em></td>
<td>LF</td>
<td>Common on drier soils</td>
</tr>
<tr>
<td>Red dead-nettle</td>
<td><em>Lamium purpureum</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Dandelion</td>
<td><em>Taraxacum agg.</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td><strong>Trees and shrubs</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sycamore</td>
<td><em>Acer pseudoplatanus</em></td>
<td>O</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Silver birch</td>
<td><em>Betula pendula</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Hazel</td>
<td><em>Corylus avellana</em></td>
<td>F</td>
<td>Common &amp; widespread, on less acid soils</td>
</tr>
<tr>
<td>Hawthorn</td>
<td><em>Crataegus monogyna</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Blackthorn</td>
<td><em>Prunus spinosa</em></td>
<td>F</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Dog rose</td>
<td><em>Rosa canina</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Rose sp.</td>
<td><em>Rosaceae sp.</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Willow sp.</td>
<td><em>Salix sp.</em></td>
<td>R</td>
<td>Common &amp; widespread</td>
</tr>
<tr>
<td>Elder</td>
<td><em>Sambucus nigra</em></td>
<td>O</td>
<td>Common on nutrient-enriched soils</td>
</tr>
</tbody>
</table>

Species present are common and widespread. The hedgerow provides potential habitat for dormice, great crested newts, bats, breeding birds and reptiles. This is discussed further in section 4.2.2.

**Scrub (Target note 14)**

Large areas of scrub are present to the east comprising dominant bramble and gorse (*Ulex europaeus*).

These species are common and widespread. This habitat provides potential habitat for reptiles, great crested newts, badgers and breeding birds which is discussed further in section 4.2.2.

**Scattered trees (Target note 15)**

Scattered trees were recorded along the western boundary of the site. Species comprise willow sp. (*Salix sp.*) and silver birch (*Betula pendula*).

Scattered trees provide potential habitat for breeding bird and bats and this is discussed further in section 4.2.2.

**Tall ruderal (Target note 16)**

Areas of tall ruderal are present around the old aviation buildings. These areas are dominated by bracken, common nettle, cow parsley (*Anthriscus sylvestris*) and broad leaved dock (*Rumex obtusifolius*).
These species are common and widespread. This habitat provides potential habitat for reptiles, great crested newts, badgers and breeding birds which is discussed further in section 4.2.2.

### 4.2.2 Protected species assessment

#### Badgers

A badger sett is present in the eastern section of the site in an area of dense bracken within the broadleaved woodland. The sett appeared old and disused with the entrance obscured by bracken with no clear pathways leading away from it. An additional badger sett was recorded approximately 100 metres beyond the eastern boundary of the site, near to a water storage facility in the middle of the arable field. The site is therefore considered likely to be used by commuting badgers although evidence of use on the site itself was limited to pathways only. No signs of foraging or latrines was present on the site itself. A map detailing the location of the badger sett has been provided as appendix II.

_Further recommendations have been made in section 5.2._

#### Bats

**Buildings**

During the ecological appraisal access was not available around the buildings. The buildings are of a type and size that may have features which could be used by roosting bats.

_Due to the buildings having potential to support bats further recommendations have been made in section 5.3._

**Trees**

Due to the quantity of trees on site a full phase 1 bat survey of the trees was not undertaken during the phase 1 survey. The areas of woodland included mature trees which may provide features suitable for bats. The scattered trees across the site are all of a small size and lack features which could be used by bats.

_Further recommendations have been made in section 5.3 due to the potential for suitable trees that could support bat roosts to be present within the woodland areas on site._

**Foraging habitat**

The areas of arable land provide limited foraging opportunity for the local bat population and the site is fairly open and exposed. The woodland edges on the site may provide commuting routes for the local bat population with surrounding habitat providing good
habitat for bats with woodland present to the south of the site. The site therefore provides moderate quality habitat for bats.

*The site has been assessed as being of moderate quality for foraging bats and further recommendations have been made in section 5.3.*

**Dormice**

The broad-leaved woodland, hedgerows and scrub habitat on site provides suitable habitat for dormice which includes favoured foraging plant species such as hazel (*Corylus avellana*), honeysuckle (*Lonicera periclymenum*) and bramble (*Rubus fruticosus* agg.). The site has good connectivity to the surrounding habitats and whilst no records of dormice were provided by SBIS it is possible they are still present on site. Dormice have a restricted distribution in Suffolk, however, there are a number of known sites in the Ipswich area.

*Further action has been recommended in section 5.4.*

**Great crested newts**

The semi-improved grassland areas, scrub, woodland and hedgerows provide potential great crested newt terrestrial habitat. Two records of great crested newt were received from SBIS during the desk study, with the closest record approximately 815 metres to the west of the site. This area is separated from the site by Bell Lane which is not considered to be a significant barrier to movement. There are two ponds within 500 metres of the site, the locations of which are shown in appendix III, and HSI assessments were conducted on these waterbodies where access allowed. Pond one was open access and appears to have been created for a neighbouring scheme and was supporting a large population of frogs during the initial survey work. The HSI assessment for this waterbody showed the pond provides good habitat for great crested newts. The results of the HSI assessment are provided in table 12 below.

**Table 12: HSI assessment for pond 1**

<table>
<thead>
<tr>
<th>Habitat Suitability Index</th>
<th>SI Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Factor</td>
<td></td>
</tr>
<tr>
<td>Map location</td>
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</tr>
<tr>
<td>Surface area</td>
<td>0.20</td>
</tr>
<tr>
<td>Desiccation rate</td>
<td>0.90</td>
</tr>
<tr>
<td>Water quality</td>
<td>1.00</td>
</tr>
<tr>
<td>Shade</td>
<td>1.00</td>
</tr>
<tr>
<td>Waterfowl</td>
<td>0.67</td>
</tr>
<tr>
<td>Fish population</td>
<td>0.75</td>
</tr>
<tr>
<td>Pond density</td>
<td>1.00</td>
</tr>
<tr>
<td>Terrestrial habitat</td>
<td>1.00</td>
</tr>
<tr>
<td>Macrophyte cover</td>
<td>0.41</td>
</tr>
</tbody>
</table>
Pond 2 is a drainage feature and no access was possible to this water body. The waterbody was partially viewed through a fence which showed a pond surrounded by good quality newt habitat. Great crested newts may be present on site and further surveys will be required to establish presence/absence.

Further recommendations have been made in section 5.5.

Natterjack toads

SBIC has returned a single record of a natterjack toad (*Epidalea calamita*) approximately 185 metres to the east of the site dated 2010. This is a very rare species in the UK and is only found in a limited number of locations. This species prefers coastal sand dune systems, coastal grazing marshes and sandy heaths. The record is from the neighbouring heathland area and the site itself supports some sandy areas within the broad-leaved woodland area to the east of the site. The site lies within an area identified as supporting natterjack toads in the past and therefore may be present on the site.

Further recommendations have been made in section 5.6.

Invertebrates

SBIC has returned records for stag beetles, silver-studded blue and white-letter hairstreak within two kilometres of the site boundary. Silver-studded blue are found in large numbers on Martlesham Heath and this species is a predominantly heathland species. The caterpillars of this species favour heathland species and gorse (*Ulex sp.*). The site is considered to be sub-optimal habitat, however, European gorse (*Ulex europaeus*) is present on the site and this species may therefore be present.

Stag beetles are found within areas of dead wood and the woodland within the north east corner of the site may provide some habitat for this species.

White-letter hairstreak have been recorded in the area but this species is closely linked with elm which is absent from the site. This species is therefore not considered to be present on the site.

Further action for invertebrates has therefore been recommended in section 5.7.

Breeding birds

Old bird nests were noted within the hedgerows on the site during the survey. In addition to this skylark (*Alauda arvensis*) were recorded singing across the site with multiple males present. Skylark are a red list BoCC species and are a UKBAP species. Meadow pipit
*(Anthus pratensis)* were also recorded singing on the site which is an amber BoCC species. Both these species are notable ground nesting species.

*Further recommendations have been made in section 5.8.*

**Over-wintering birds**

The large open fields provide some potential to be used by over wintering birds such as golden plover (*Pluvialis apricaria*) and dark-bellied brent geese (*Branta bernicla*). The proximity of an SPA also increases the likelihood that large numbers of over-wintering birds may be present on the site.

*Further recommendations have been made in section 5.9.*

**Reptiles**

The areas of scrub, tall ruderal and semi-improved grassland provides potential habitat for common species of reptiles. SBIS has provided records of all four common species of reptile in the local area and the site has good connectivity to surrounding areas. Reptiles are therefore likely to be present within the suitable habitat.

*Further recommendations have been made in section 5.10.*

**Hedgehog**

SBIS returned 334 records of hedgehog within two kilometres of the site and suitable foraging/nesting habitat for hedgehogs in the form of hedgerows, woodland and grassland was also recorded. The site is therefore considered to have moderate potential for this UK BAP species.

*Further action for hedgehogs has therefore been recommended in section 5.11.*
5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 Designated sites

The Conservation of Habitats and Species Regulations 2010 imparts duty on Local Planning Authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European site, either alone or in combination with other plans or projects.

The site lies approximately 2.97 kilometres east of the Deben Estuary SPA, Ramsar and SSSI and 4.51 kilometres west of the Stour and Orwell Estuaries SPA. The site is considered a sufficient distance away from these designated sites to not have any direct impacts such as pollution or indirect impacts from noise. There is, however, the potential for the site to cause an indirect impact on these designated sites by increasing the recreational pressure.

The appropriate assessment for Suffolk coastal has determined that developments over 1 kilometre from the Deben Estuary SPA, Ramsar and Stour and Orwell Estuary SPA will not increase the recreational pressure on this designated site as long as appropriate green space is provided (The Landscape Partnership 2011) –

Provided that strategic housing proposals for development at Martlesham and Felixstowe Peninsula are greater than 1km from the Deben Estuary and Orwell Estuary respectively, together with improvements in accessibility to greenspace provision, it is unlikely that visitor recreation activity would substantially increase on the foreshore of those estuaries. It is therefore concluded that there would be no adverse effect upon the integrity of the respective European sites.

The development will therefore need to provide alternative green space for walkers. This green space should provide circular walks to encourage dog walkers to utilise this space instead of nearby designated sites. Leaflets should be distributed to new homeowners to outline alternative walking areas than the designated sites to further lower the likelihood of the designated sites being visited frequently by the new residents.

Ipswich Heaths SSSI lies to the east of the site boundary to the east of Dobbs Lane and is an area of open heathland. Foxhill Stadium Wood CWS lies to the west of the site boundary on the opposite side of Bell Lane. Potential impacts from recreation on this site will be addressed through the provision of green space within the design of the proposals, along with advice for responsible use of this site within a information leaflet that will be distributed to new residents.

Precautionary measures outlined below will ensure these neighbouring designated areas are protected during construction.
• A Construction Method Statement (CMS) will be prepared and implemented by the engineering contractor that sets out detailed methods of construction and how materials/chemicals will be stored and controlled on-site to avoid pollution and siltation (for example, all plant will be fitted with drip trays in order to avoid potential pollution incidents to the adjacent SSSI and CWS and no refuelling will take place on the site).

• Prior to commencement of works, an appropriately qualified ecologist will provide a toolbox talk to all members of the construction workforce. This induction will cover the importance and value of habitat immediately beyond the site boundary. The talk will state that all activities must be contained within the site boundary and will ensure that the workforce is aware of the hierarchy of command and the need to protect adjacent habitat from damage or pollution.

• A periodic construction watching brief will be kept by an appropriately qualified ecologist to ensure works proceed with no damage to adjacent habitat.

5.2 Badgers

5.2.1 Summary of findings

A badger sett was recorded approximately 100 metres to the east of the site around a water storage facility in the middle of the arable field with an additional sett along the eastern boundary. If these areas are to be impacted by the development additional surveys and mitigation will be required.

5.2.2 Recommendations for further surveys and mitigation

The proposal should aim to design the housing scheme to allow a thirty metre buffer from the badger setts. If this is not possible and the setts are within the footprint of the works the following mitigation will be required:

• The setts will be monitored prior to works commencing to assess whether the holes are still active. Monitoring will be conducted over a period of twenty one days and will be undertaken using camera traps which will record any badger activity. In addition, sticks will be firmly inserted into the sett entrance in such a way that they will not be knocked down unless pushed by a badger or other larger animal.

• Should the monitoring reveal that the setts are disused, there would be no need for a sett closure licence and works can proceed.

Should the monitoring reveal that the setts are active, then proposals may require the permanent or temporary closure of the setts under a Natural England licence.
This may include the following activities, although the details will be dependent on the design of the proposals and works that are required within the vicinity of the badgers setts:

- The existing sett may be temporarily closed with the use of one-way gates. A licence is required from Natural England to allow this, and the licence will only allow such interference with a sett between July and November when badgers are less sensitive in terms of their breeding cycle.

- The gates will remain in place for the duration of the works and will be checked every three days to ensure that badgers have not dug back into the sett. Following the completion of the works the gate will be removed to allow badgers to re-enter the sett or the sett will be dug out.

- Where works are likely to cause disturbance only with no risk of affecting badger tunnels or chambers the badger licence will cover disturbance activities only and will include timing constraints (between July and November only) and will include measures to reduce aspects such as noise and vibration through working practice.

- If permanent closure of the sett is required an artificial sett will be required to mitigate for the loss of the sett.

General site mitigation for badgers will be required within the design of the new development and during construction due to the presence of badgers in the local area, allowing for the continued availability of foraging habitat for this species. Measures will include the following:

- Badger foraging habitat will be incorporated into the retained woodland in the south-west of the site. It is proposed that the woodland will be enhanced by planting of fruiting species which badgers favour, including crab apple (*Malus sylvestris*), bramble, cherry (*Prunus avium*), plum (*Prunus domestica*), and elder, hawthorn, blackthorn, field maple (*Acer campestre*), and hazel (*Corylus avellana*).

- Any trenches during the construction will be backfilled nightly, boarded over or will have a ramp installed in order to prevent any wildlife becoming trapped overnight. Exit ramps will involve either earth being slopped at one end or a plank fitted.
5.3 Bats

5.3.1 Summary of findings

Buildings

It was not possible to carry out a full inspection of the buildings for the presence of bats during the initial survey, however, the buildings are of a size and type that may provide roosting opportunities for bats. Recommendations for further survey work have been made below.

Trees

There are numerous trees within the site, and therefore a detailed inspection of trees for signs of bat was outside the scope of the initial survey visit. Recommendations for further survey work have been made below.

Foraging habitat

The site was assessed as ‘moderate quality foraging habitat’. Records obtained from SBIS indicated the presence of common bat species such as both common and soprano pipistrelle, noctule, serotine and brown long-eared. The development will affect a wide variety of habitat types that could be used by foraging and commuting bats. Further survey work has therefore been recommended below.

5.3.2 Recommendations for further surveys

Buildings

If the buildings are to be impacted by the development a full phase 1 bat survey will be required. This will involve a surveyor inspecting the buildings for any features suitable for bats and carrying out a full internal inspection where access is available. If the buildings are then found to have potential for bats additional phase 2 surveys will be required and a licence from Natural England may also be required.

Trees

There are sections of both broad-leaved and mixed woodland on site which may hold potential for roosting bats. A full phase 1 bat survey and an endoscope survey will be undertaken by a class 2 bat licence worker once the arboricultural report is available with details of trees programmed for removal. If trees are identified as being used by bats or hold the potential to support roosting bats then a suite of dusk evening emergence and dawn
re-entry surveys will take place in accordance with the Bat Conservation Trust (BCT) survey guidelines (Collins, 2016).

Where bats are recorded roosting within the trees a licence from Natural England will be required to facilitate the removal of these trees.

**Foraging habitat**

*Activity transects*

The site has been assessed as holding moderate quality habitat for foraging and commuting bats based on the habitats present on site, including the woodland edges, hedgerows and woodland adjacent to the south of the site.

In accordance with the BCT guidelines (Collins, 2016) one survey visit will be undertaken in each month from April to October resulting in a total of seven activity transects. At least one of these activity transects will comprise a combined dusk and pre-dawn survey conducted in one 24 hour period. It is worth noting that in the event that any Conservation of Habitats and Species Regulations 2010 Annex II species are recorded, a greater intensity of survey work will be required to comply with the guidelines.

The dusk transect surveys will begin at or just before sunset and continue for approximately two hours afterwards in order to detect bats commuting from roost sites to foraging sites. The dawn surveys will commence two hours before sunrise and continue until or shortly after sunrise if bats are still active.

The activity transect surveys will involve walking pre-defined routes which incorporate key areas that are likely to be important for foraging and/or commuting bats. Such areas include scrub and grassland and linear features such as hedgerows and woodland / scrub edge.

*Static monitoring*

The static monitoring will be undertaken in accordance with best practice guidelines (Collins, 2016).

Static monitoring will be used to supplement the activity transect surveys, as transect surveys are limited in that they can only provide a snapshot of bat activity at any one time. The combination of static monitoring and transect surveys aims to provide a more reliable representation of the levels of bat activity on site, as well as providing further information on whether the site is used by bats for swarming and/or mating.

The site was assessed as holding moderate quality habitat for foraging and commuting bats. In accordance with the BCT’s guidelines two static monitoring devices will be used for each transect route and will collect data on five consecutive nights per month from April.
to October in appropriate weather conditions for bats. This will result in a total of 35 nights of static monitoring over the seven months. The results of the activity surveys and static monitoring will inform the design of the housing scheme, in particular any lighting scheme and the soft landscaping, to ensure minimal impacts on bats, ensuring the continued use of the site post-construction.

5.4 Dormice

5.4.1 Summary of findings

The broad-leaved woodland and scrub habitat on site has the potential to be used by dormice from the local area. Whilst the SBIS did not hold any records of dormouse, and the fact that dormouse has a restricted distribution in Suffolk, there are known populations in the Ipswich area. It is therefore possible that dormice may be present, particularly given the connectivity of the site to woodlands in the wider landscape.

5.4.2 Recommendations for further surveys and mitigation

Dormouse surveys involve placing dormice tubes or boxes within the hedges and suitable habitat on site which are then checked monthly from May to September for evidence of dormice such as nests or dormice themselves.

If dormice are found to be present on site a mitigation scheme and European Protected Species Licence will be required prior to the removal of the suitable habitat.

The broad-leaved woodland and mixed woodland within the site provides good quality habitat for foraging, nesting and hibernating dormice. In order to mitigate the potential risk to dormice from the proposed works the following mitigation measures are proposed at the site if dormice are present:

- A buffer zone of 10 metres between the site and the woodland is required in order to minimise the disturbance to dormice. The planting within the buffer zone will provide suitable foraging species for dormice and include hazel, dog-rose (*Rosa canina*), elder, hawthorn, blackthorn, honeysuckle (*Lonicera periclymenum*), bramble and guelder-rose (*Viburnum opulus*).

- Cat predation is not anticipated to be a major problem on this site due to the 10 metre buffer zone providing shelter from this predator.

Where removal of dormouse habitat is required the following will need to be implemented:

- Clearance will need to be carried in either September/early October when dormice are active and litters have become independent prior to hibernation or May when dormice are active prior to the birth of litters. An alternative is to undertake the clearance in a two-stage operation with removal of surface vegetation in winter (to
no lower than 20 cm above the ground) followed by stump extraction and earth removal the following summer. Stump removal from the hedgerows must take place after May when dormice have woken from torpor and left the area. The area around the stumps will need to be hand searched by a licensed ecologist before the stumps can be removed.

- Clearance works during this time should be carried out by directional clearing with dormice being encouraged to move away from the works area into neighbouring suitable habitat. The disturbance from the machinery will encourage the dormice to move away.
- Phased vegetation clearance should ensure that dormice do not have to travel more than approximately fifty metres to the nearest suitable habitat during the clearance.
- A thorough check for dormouse nests will be undertaken by the ecological clerk of works no more than one day prior to any clearance works.
- Dormice are more active at night, therefore all works should be undertaken within daylight hours so that they can forage and nest normally in retained sections of hedge.
- All the workers on site will be briefed before works commence and made aware of the potential presence of dormice on site.

5.5 Great crested newts

5.5.1 Summary of findings

An HSI was undertaken on one of the ponds surrounding the site. The pond was assessed as providing good suitability for great crested newts. An additional pond is present within 500 metres of the site but this was not accessible during this initial survey. Habitat is present on the site which may be used by great crested newts in the form of scrub, hedgerows, tall ruderal and woodland and if present in surrounding ponds are likely present within the terrestrial habitat on the site therefore further surveys are required.

5.5.2 Recommendations for further surveys and mitigation

eDNA

A technique for surveying great crested newts known as environmental DNA testing (eDNA) which can be conducted from 15th April to 30th June could be implemented. This involves taking water samples from all waterbodies within 500 metres of the site for DNA analysis which can confirm presence or absence of great crested newt. If great crested newts are found to be present in any of the ponds then additional survey work will be required (see below). The surveys should be carried out early in the season to ensure that if the additional surveys, as detailed below, are required there is sufficient time to carry them out. Or alternatively in the previous season to the full surveys depending on timescales.
Aquatic great crested newt surveys

Targeted surveys must be undertaken during the period from March to June. The surveys should be conducted in accordance with the Great Crested Newt Mitigation Guidelines (English Nature 2001) which recommends that a minimum of three survey techniques are employed, ideally bottle trapping, torch survey and egg search. A description of these survey techniques is provided below:

- Bottle trapping: Bottle traps should be set approximately two metres apart around the margins of the ponds. The traps should be set in the early evening and collected the following morning.

- Torch counts: The pond should be visited approximately one hour after dark and a torch shone into the water and any amphibians encountered recorded.

- Egg search: Newts lay their eggs in marginal or pond-side vegetation. Vegetation within the pond should be thoroughly searched for great crested newt eggs.

A total of four survey visits are required to establish presence/absence with a total of six survey visits required to each pond to carry out a population assessment if great crested newts are confirmed as present, with three of these visits undertaken between mid-April to mid-May.

If great crested newts are present within these waterbodies a full mitigation scheme will be required and a licence from Natural England.

5.6 Natterjack toads

5.6.1 Summary of findings

There is a record of a natterjack toad on the neighbouring heathland area and it is therefore possible that this species may be present on the site. While the site provides low quality habitat the presence/absence of this species will need to be established. Recommendations for further survey work are provided below.

5.6.2 Further recommendations

As there are not any waterbodies for natterjack toads on the site itself, a nocturnal survey will be required to establish the presence or absence. These surveys use high powered torches to look for the toads when they emerge to forage after dusk. The toads will use open areas of ground and footpaths and therefore can be spotted with a torch. The surveys are weather dependent and can only be conducted after periods of rain when the
temperatures are between 10 – 15°C between April and September. A total of six surveys should be carried out to establish the presence or absence of this species.

If present on the site a full mitigation strategy will be required and a European Protection Species Mitigation Licence will need to be obtained once full planning permission has been gained.

5.7 *Invertebrates*

5.7.1 *Summary of findings*

The hedgerows and gorse on site could potentially support silver-studded blue butterflies and white-letter hairstreak butterflies. If these areas are to be impacted by the development further surveys will be required.

5.7.2 *Further recommendations*

Further survey work is required to determine whether silver-studded blue and white-letter hairstreak are currently present on the site. This will involve conducting butterfly transect surveys on the site during the adult emergence periods for these species, which for silver-studded blue is July and August, and for white-letter hairstreak is late June to mid-August (Tolman and Lewington, 2009).

Ecological enhancement measures that could potentially benefit these invertebrate species on site are provided in section 5.12.

5.8 *Breeding birds*

5.8.1 *Summary of findings*

The fields on site provide potential nesting habitat for birds including arable species with skylark and meadow pipit recorded on the site. Therefore nesting birds are likely using the open ground, scrub, buildings and woodland for breeding.

5.8.2 *Recommendations for further surveys and mitigation*

Notable species have been recorded on the site and if large areas are scheduled to be lost as part of the development, a breeding bird survey will need to be conducted to ascertain the populations of breeding birds on the site and the number of notable species present. Breeding bird surveys involve a surveyor walking a transect around the site and recording all bird activity. Surveys commence at dawn and are carried out between March and July with a total of five survey visits required.
The scheme will require mitigation for breeding birds and general mitigation points are provided below:

- All vegetation clearance and ground works should where possible be undertaken outside of the bird nesting season, this is considered to extend from the 1st March to the 31st August, or if this is not possible, must be done under the supervision of an ecologist to ensure that nesting birds are not harmed. Where nesting birds are encountered, demolition and/or clearance must be postponed until the nestlings have fledged.
- The final design of the scheme will require mitigation for the loss of habitat for skylark and meadow pipit. Wildflower meadows will be required within the Public Open Spaces of the development which will provide alternative breeding sites for these species.
- Ecological enhancement measures suggested in Section 5.12 will provide foraging and nesting opportunities for many species of bird.

### 5.9 Over-wintering Birds

#### 5.9.1 Summary of findings

The large arable fields may provide over wintering habitat for large flocks of over-wintering birds including golden plover and waders, particularly given the presence of Deben Estuary SPA / Ramsar and the Stour and Orwell Estuaries SPA / Ramsar sites. The numbers present may be of county importance.

#### 5.9.2 Recommendations for further surveys and mitigation

Winter bird surveys should be conducted between November and February to ascertain if the site is of county significance for any over-wintering bird species, such as golden plover. The common bird survey census methodology will be adopted where four visits are spread from November to February. If the site is considered to be of county importance for over-wintering birds a mitigation scheme will be designed into the development to provide habitat for these species on the site once development has been completed.

### 5.10 Reptiles

#### 5.10.1 Summary of findings

The areas of scrub, tall ruderal and semi-improved grassland provide potential habitat for common species of reptiles. SBIS has provided records of all four common species of reptile in the local area and the site has good connectivity to surrounding areas. Reptiles are therefore likely to be present within the suitable habitat and therefore further surveys have been recommended.
5.10.2 Recommendations for further surveys and mitigation

Targeted reptile surveys are therefore required to confirm presence or absence. Reptile surveys involve placing artificial refugia across the site, in the form of roofing felt, which are checked seven times. These surveys can be carried out between March and October.

In the event that reptiles are present a mitigation strategy including an exclusion and translocation exercise will be required.

5.11 Hedgehogs

The hedgehog is a UK BAP species that has experienced a dramatic population decline in recent years and is now often a material consideration within the planning process. The hedgehog will therefore need to be considered within the scheme as follows:

- Cover excavations at night or provide planked escape routes to allow animals that fall in to escape during construction.
- Provide a gap under garden fences to allow hedgehogs to move freely between gardens.
- Site hedgehog boxes within a secluded location away from roads.

5.12 Ecological enhancement

A few suggestions for ecological enhancements across the site have been made

- Provision of bat boxes and nest boxes for bird species such as swift (*Apus apus*), house martin (*Delichon urbica*) and house sparrow (*Passer domesticus*) on the walls of the buildings or trees. Bird boxes can be purchased from websites such as Alana Ecology [http://www.alanaecology.com](http://www.alanaecology.com) and Jacobi Jayne [www.jacobijayne.co.uk](http://www.jacobijayne.co.uk), and their provision on site would enhance the habitat for the local bird population.

- Use of native shrubs and trees for landscaping schemes provides foraging habitat for a range of bird species. Suitable species include hazel (*Corylus avellana*), ash (*Fraxinus excelsior*), dog-rose (*Rosa canina*), elder (*Sambucus nigra*), blackthorn (*Prunus spinosa*), hawthorn (*Crataegus monogyna*) and field maple (*Acer campestre*).

- Flowering grassland seed mixes from a supplier of seeds of local provenance can be used to seed the new lawn within the design of the development (such as
Emorsgate EL1). Such grassland provides better nectar sources for invertebrates and hence is of greater value for foraging birds, reptiles and amphibians.

- Provision of habitat for dead wood invertebrates. This can include measures such as burying a wooden ‘log’ up to one metre below the earth’s surface thus providing essential larval habitat;
6.0 REFERENCES


Multi-Agency Geographical Information for the Countryside (MAGIC) Website at [www.magic.gov.uk](http://www.magic.gov.uk)


Suffolk Biodiversity Information Services (SBIS) (2017) Kesgrave biological data

The Landscape Partnership (2011) Appropriate Assessment for Suffolk Coastal District Council Core Strategy and Development Management Policies
APPENDIX I: Phase 1 habitat map
**Phase 1 habitat key**

<table>
<thead>
<tr>
<th>Image</th>
<th>Description</th>
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<td>Building</td>
<td>Building</td>
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</tr>
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<td>T1</td>
<td>Target note</td>
</tr>
</tbody>
</table>

**Target notes to accompany Phase 1 habitat map**

<table>
<thead>
<tr>
<th>Target Note</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>T1</td>
<td>Buildings which provide potential habitat for bats and breeding birds</td>
</tr>
<tr>
<td>T2</td>
<td>Hardstanding forming the roads into the site.</td>
</tr>
<tr>
<td>T3</td>
<td>Bareground formed by vehicle movement on the site</td>
</tr>
<tr>
<td>Target Note</td>
<td>Description</td>
</tr>
<tr>
<td>------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>T4</td>
<td>The majority of the site is comprised of arable land with a perennial ryegrass crop (<em>Lolium perenne</em>) and areas that had been recently ploughed.</td>
</tr>
<tr>
<td>T5</td>
<td>Fallow field which has been colonised by cock’s-foot (<em>Dactylis glomerata</em>) (O), red fescue (<em>Festuca rubra</em>) (O), wavy bitter-cress (<em>Cardamine flexuosa</em>) (LO), common mouse-eared (<em>Cerastium fontanum</em>) (R), cleavers (<em>Galium aparine</em>) (O), dove’s-foot crane’s-bill (R), cat’s-ear (<em>Hypochoeris radicata</em>) (LO), common mallow (<em>Malva sylvestris</em>) (F), common ragwort (<em>Senecio jacobaea</em>) (O), European gorse (<em>Ulex europaeus</em>) (O), common nettle (<em>Urtica dioica</em>) (O).</td>
</tr>
<tr>
<td>T6</td>
<td>Short sward amenity grassland with red fescue (F), perennial ryegrass (D), dove’s-foot crane’s-bill (O), yarrow (<em>Achillea millefolium</em>) (F), common ragwort (O), spear thistle (<em>Cirsium vulgare</em>) (O), spotted medic (<em>Medicago arabica</em>) (LA), broad-leaved dock (<em>Rumex obtusifolius</em>) (R), daisy (<em>Bellis perennis</em>) (LD), cat’s-ear (F), trefoil sp. (<em>Trifolium sp.</em>) (F).</td>
</tr>
<tr>
<td>T7</td>
<td>Semi-improved grassland with pampas grass (<em>Cortaderia selloana</em>) (R), cock’s-foot (F), Yorkshire-fog (<em>Holcus lanatus</em>) (O), perennial ryegrass (F), rough meadow-grass (<em>Poa trivialis</em>) (LO), yarrow (O), creeping thistle (<em>Cirsium arvense</em>) (R), spear thistle (<em>Cirsium vulgare</em>) (R), willowherb sp. (<em>Epilobium sp.</em>) (LF), cleavers (<em>Galium aparine</em>) (O), dove’s-foot crane’s-bill (F), cat’s-ear (LF), red dead-nettle (<em>Lamium purpureum</em>) (O), ribwort plantain (<em>Plantago lanceolata</em>) (O), creeping cinquefoil (<em>Potentilla reptans</em>) (R), bramble (<em>Rubus fruticosus agg.</em>) (O), common ragwort (O), red clover (<em>Trifolium pratense</em>) (O), European gorse (R), common nettle (O), vetch sp. (<em>Vicia sp.</em>) (F), oak saplings (<em>Quercus sp.</em>) (R) and willow saplings (<em>Salix sp.</em>) (R).</td>
</tr>
<tr>
<td>T8</td>
<td>Semi-improved grassland with common bent (<em>Agrostis capillaris</em>) (F), cock’s-foot (F), Yorkshire-fog (O), perennial ryegrass (O), rough meadow-grass (LO), ling heather (<em>Calluna vulgaris</em>) (LO), yarrow (O), cow parsley (<em>Anthriscus sylvestris</em>) (O), dove’s-foot crane’s-bill (F), herb-Robert (<em>Geranium robertianum</em>) (O), cat’s-ear (LF), common mallow (<em>Malva sylvestris</em>) (O), ribwort plantain (O), creeping cinquefoil (F), selfheal (<em>Prunella vulgaris</em>) (O) and creeping buttercup (O).</td>
</tr>
<tr>
<td>T9</td>
<td>Improved field margin dominated by perennial ryegrass, frequent red fescue and occasional common ragwort and ribwort plantain.</td>
</tr>
<tr>
<td>T10</td>
<td>Broad-leaved woodland strip with bracken (<em>Pteridium aquilinum</em>) (R), ivy (<em>Hedera helix</em>) (F), Rose sp. (<em>Rosa sp.</em>) (O), bramble (O), willow sp. (F), beech (<em>Fagus sylvatica</em>) (O) and sycamore (<em>Acer pseudoplatanus</em>) (O).</td>
</tr>
<tr>
<td>T11</td>
<td>Broad-leaved woodland with perennial ryegrass (F), bracken (LD), cleavers (O), honesysuckle (<em>Lonicera periclymenum</em>) (F), bramble (F), European gorse (LD), common nettle (F), silver birch (<em>Betula pendula</em>) (F) and pedunculated oak (<em>Quercus robur</em>) (F).</td>
</tr>
<tr>
<td>T12</td>
<td>Mixed plantation with cock’foot (O), rough meadow-grass (<em>Poa trivialis</em>) (F), holly (O), bramble (O), sycamore (O), silver birch (F), sweet chestnut (<em>Castana sativa</em>) (O), Scot’s pine (<em>Pinus sylvestris</em>) (F) and pedunculated oak (F).</td>
</tr>
<tr>
<td>T13</td>
<td>Hedgerow with perennial ryegrass (O), cleavers (F), ivy (LD), holly (LF), red dead-nettle (R), dandelion (O), sycamore (O), silver birch (R), hazel (<em>Corylus avellana</em>) (F), hawthorn (<em>Crataegus monogyna</em>) (F), blackthorn (<em>Prunus spinosa</em>) (F), dog rose (<em>Rosa canina</em>), willow sp. (R), elder (<em>Sambucus nigra</em>) (O).</td>
</tr>
<tr>
<td>Target Note</td>
<td>Description</td>
</tr>
<tr>
<td>-------------</td>
<td>-------------</td>
</tr>
<tr>
<td>T14</td>
<td>Large areas of scrub are present to the east comprising dominant bramble and gorse.</td>
</tr>
<tr>
<td>T15</td>
<td>Scattered trees were recorded along the western boundary of the site. Species comprise willow sp. and silver birch.</td>
</tr>
<tr>
<td>T16</td>
<td>Areas of tall ruderal are present around the old aviation buildings. These areas are dominated by bracken, common nettles, cow parsley and broad leaved dock.</td>
</tr>
</tbody>
</table>
APPENDIX II: Badger sett map

Possible badger sett location – due to dense bracken cover only one hole was recorded
Sett 1 map

**Key**
- Partially used sett entrance hole
- Disused sett entrance hole
- Fence
APPENDIX III: Waterbody Location Plan

[Diagram showing locations of Pond 1 and Pond 2]
**Appeal Decision**

Inquiry Held on 8, 9 and 10 August 2017  
Site visit made on 7 August 2017  

by P W Clark  MA MRTPI MCMI  
an Inspector appointed by the Secretary of State for Communities and Local Government  

**Decision date:** 16 October 2017  

**Appeal Ref:** APP/J3530/W/16/3160194  
**Land East of Bell Lane, Kesgrave**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.  
- The appeal is made by Persimmon Homes Limited and BPT Limited against the decision of Suffolk Coastal District Council.  
- The application Ref DC/15/4672/OUT, dated 18 November 2015, was refused by notice dated 15 July 2016.  
- The development proposed is 300 dwellings, provision of land for a primary school and associated landscaping and open space.

**Decision**

1. The appeal is dismissed.

**Application for costs**

2. At the Inquiry an application for costs was made by Persimmon Homes Limited and BPT Limited against Suffolk Coastal District Council. This application is the subject of a separate Decision.

**Procedural matters**

3. The application was made in outline with all matters reserved apart from access but only details of one vehicular access from Bell Lane are submitted for approval now, so other details of access would remain for subsequent approval, if permission were granted, together with details of appearance, landscaping, layout and scale. In consequence, those matters are not at issue in this decision.

4. In accordance with a direction given by the Secretary of State in February 2014, the application is accompanied by an Environmental Statement. This includes three parameter plans covering density, building heights and land uses. In accordance with decisions of the courts\(^1\) these parameter plans must be applied by condition, if permission is granted, so as to establish an envelope within which the detailed design and discharge of reserved matters can proceed, irrespective of whether or not they would otherwise be required to make the development acceptable. In consequence, those matters are taken into account in this decision.

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\(^1\) R v Rochdale MBC ex parte Tew and Others [1999] 3 PLR 74 and R v Rochdale MBC ex parte Milne [2000] EWHC 650 (Admin)
5. Not far from Kesgrave is the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar, and the Deben Estuary SPA and Ramsar. Natural England advises that there is the potential for a residual impact on the Deben Estuary SPA/Ramsar site from this development proposal in combination with others. Regulation 61(1) of the Habitats Regulations makes it clear that if a plan or project is likely to have a significant effect on a protected site (either alone or in combination with other plans or projects) and it is not directly connected with or necessary to the management of the site, the competent authority shall undertake an Appropriate Assessment of the implications for the site in view of its conservation objectives.

6. However, Natural England also advises that provided adequate green infrastructure is built in to the proposal to provide for the dog-walking requirements of potential future residents and provided a proportionate contribution is made to the strategic recreational disturbance mitigation scheme being developed by Suffolk Coastal District Council in combination with neighbouring authorities, then the proposal can be screened out from further stages of assessment because significant effects are then unlikely to occur either alone or in combination with other plans or projects. It is agreed by all parties that the green infrastructure can be secured through a planning condition. The appeal is accompanied by a planning obligation which provides for the payment of a contribution to the strategic mitigation scheme. Accordingly, no Appropriate Assessment under the Habitat Regulations is required.

7. The proposal is accompanied by two planning obligations and an Options Agreement with Suffolk County Council. Between them, these also provide for one third of the dwellings proposed to be provided as Affordable Housing, for a travel plan, an on-site play area (LEAP), a public path across the site, payment for the County’s costs in promoting public path creation orders across land to the north of the site, a five year subsidy for bus stops and a bus service along Foxhall Road to the south of the site, payment for the County’s costs in promoting a Traffic Regulation Order to extend speed limits in the vicinity of the site and for the County to purchase within seven years the part of the site allocated as land for a primary school extension. I consider the necessity of these proposals, their relationship with the development and their proportionality in subsequent parts of this decision but, because I have concluded that the appeal should be dismissed in any event, it has not been necessary for me specifically to conclude on their compliance with the CIL regulations.

8. There are acknowledged to be two defects in the Council’s decision notice as originally issued. It omitted to refer to DM3 of the Suffolk Coastal Local Plan Core Strategy and Development Management Policies Development Plan Document adopted in July 2013 but it is accepted that this amplifies policy SP28 which is applied by policy SP20 which is referred to in the decision notice. The notice also incorrectly asserts that the site falls within the main urban corridor of Kesgrave, Martlesham and Rushmere St Andrew referred to in policy SP20, when in fact it does not. Both these errors were identified and brought to notice well in advance of the Inquiry.

9. I made an unaccompanied visit to the site before the Inquiry. Because of the outline nature of the application, no matters of contention arose during the
Inquiry which required resolution with the aid of a further site visit and so, with the agreement of the parties, no additional accompanied site visit was made.

10. Although the format of this appeal was announced as an Inquiry and the majority of the event conducted according to that procedure, both main parties requested that one issue, relating to housing land supply, be dealt with through a round table discussion. As no third parties wished to make contributions on that issue, I agreed.

11. This appeal was meant to be determined following an Inquiry which opened on the 25 April 2017. That Inquiry closed without a decision because the Council was about to publish a new Strategic Housing Market Assessment (SHMA) containing a new assessment of OAN. Both parties agreed that in the interests of fairness and to ensure that the decision would be based on the most up to date information, that Inquiry should be halted. In the event, the Inspector was not in a position to continue following the publication of the SHMA and so that Inquiry was closed without decision and the present Inquiry arranged.

12. This Inquiry sat on the days indicated but was held open to allow for the signing of the planning obligations and an option agreement with the County Council and because Suffolk Coastal District Council was due to issue its reviewed Local Plan Issues and Options document a few days after the Inquiry sittings ended but before my decision was likely to be issued. All parties agreed that this document was likely to be relevant to my decision and that they should be allowed to provide written comments on it. I concurred and so the Inquiry was held open for this to take place.

13. The parties made reference to at least seven appeal decisions and eleven legal judgments in making their cases. In this decision, I do not make specific reference to or comment on any of those, unless the distinct circumstances of this case might otherwise not be self-evident.

Main Issues

14. There are three main issues, one with several parts. The first main issue is not in dispute between the two main parties. It is identified through third parties’ representations. It is whether the site is in a location which is, or can be made, sustainable. This is the phrase used in the penultimate bullet point of paragraph 17 of the National Planning Policy Framework (NPPF). In this decision I use the phrase “sustainable location” as shorthand for the words used in the NPPF.

15. The second main issue is whether the proposal would be harmful for the reasons stated in the Council’s decision, which can be summarised as:

- A location in what the development plan defines as countryside outside the physical limits boundary
- Prejudice to open space provision and network connections and
- Pressure on services

16. The third main issue is the effect of the proposal on the supply of housing.
Reasons

Sustainable location

(i) Principles

17. There are three dimensions to sustainable development; economic, social and environmental. A sustainable location is not synonymous with a sustainable development but it contributes to all three dimensions; to the economic role by characterising land which is in the right place; to the social role through the provision of accessibility to local services; and to the environmental role by using natural resources in transport prudently, minimising waste and pollution.

18. One of the government’s core planning principles is that planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable. This appeal proposal is sufficiently significant to warrant Environmental Impact Assessment and so this principle should apply to its consideration.

19. The principle is elaborated in the National Planning Policy Framework (NPPF). Recognising that circumstances vary depending on the nature and location of the site, paragraphs 29, 32, 34 and 38 advise that decisions should take account of whether the opportunities for sustainable transport modes have been taken up so as to reduce the need for major transport infrastructure and should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes should be maximised. A mix of uses should be promoted in order to provide opportunities to undertake day-to-day activities including work on site and, where practical, key facilities such as primary schools and local shops should be located within walking distances of most properties.

(ii) Kesgrave

20. The Settlement Hierarchy for the Suffolk Coastal District is, as stated in policy SP2 of the adopted Suffolk Coastal District Local Plan, drawn up on the principles of sustainable development and sustainable communities. That settlement hierarchy is set out in that plan’s policy SP19. It includes the Eastern Ipswich Plan Area as one of two major centres within the district. That concept is refined in policy SP20 which divides the Eastern Ipswich Plan Area into three sections, one of which is the main urban corridor of Kesgrave, Martlesham and Rushmere St Andrew where the completion of long-standing housing allocations and other small scale development opportunities within the defined built up area is envisaged. For these reasons, both main parties recognise Kesgrave as a sustainable location in general terms.

(iii) The site

21. But, although the site is separated from Kesgrave only by the 20m width of a bridleway, it is outside Kesgrave and the main parties’ agreement that Kesgrave is a sustainable location does not automatically extend from the existing settlement to the site. It is a long and relatively narrow site,
extending in depth from Bell Lane at its west end where vehicular, pedestrian and cycle access is readily achievable.

22. The various planning obligations submitted with the appeal make provision to pay the County Council up to £8,500 per link incurred in making up to three Public Path Creation Orders to link the site across the bridleway to the settlement of Kesgrave to the north. There is opposition from the landowner of the hedgerow which bounds the south side of the bridleway to the creation of these links so there can be no guarantee of their provision but, for the purposes of this decision, I have presumed that at least one link would succeed.

23. Even so, the table of local facilities in close proximity to the site, originally provided in Mr Dix’s note attached to Mr Collins’s evidence on behalf of the appellants and reissued with corrections during the Inquiry (Inquiry documents 8 and 20) shows that not one of the facilities listed would be within a desirable walking distance from the centre of the site. Only two facilities (Cedarwood Primary School and the Millenium Sports and pavilion (including youth club)) would be within the acceptable walking distance for commuting or school trips. Most of the listed facilities would exceed even the preferred maximum walking distance using the commonly accepted Guidelines for Providing for Journeys on Foot of the Institution of Highways and Transportation.

24. Of course, walking distances are not the only yardstick by which to judge a sustainable location. NPPF paragraph 38 seeks opportunities to undertake day-to-day activities on site. NPPF paragraph 34 advises that developments generating significant movement should be located where the need to travel can be minimised and the use of sustainable transport modes can be maximised. These are defined in NPPF Annex 2 as including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

25. There is no indication at this outline stage that the scheme would offer particular encouragement to ultra-low emission vehicles such as through the provision of electrical vehicle charging points, though such could probably be required through condition when details are submitted at reserved matters stage. The Suffolk Car Share link would be provided in the Welcome Pack for Residents as part of the submitted Initial Travel Plan, which could be secured by condition.

26. National Cycle Route 1 runs in an east-west direction approximately 1km north of the site. There are also quiet cycle routes concentrated within the built up residential areas directly north and north-west of the site, though a local resident asserted that the speed (even within the speed restricted area) and volume of traffic on, and the width of, Bell Lane made it unattractive to cyclists. Cycling does not appeal to all but the facilities in the appellant’s list would all be within reasonable cycling distance. However, not all day-to-day requirements are in the appellant’s list.

27. In terms of day-to-day living, the availability of work is probably one of people’s main considerations. Other than at the facilities listed in Kesgrave, little or no employment opportunity would be provided on site or within an acceptable, let alone desirable, walking distance. For those using a bus to get to work, the nearest existing bus stop is in Ropes Drive about 1km from the centre of the site. Another is at the junction with Penzance Road, about 900m
along Bell Lane from the entrance to the site. Although walkable, none of these are close enough to encourage their use. Planning obligations would provide additional bus stops on Foxhall Road but as these would be a similarly unattractive distance to the south of the site, their provision would give little more encouragement to the use of public transport. So, other than for homeworking, the development would give rise to a need to travel to find work. In terms of this activity, the proposal would thus be contrary to the advice of NPPF paragraph 34.

28. The development of this site would give rise to a need to travel for all day-to-day activities but particularly for work. It would be capable of promoting sustainable travel modes such as car sharing and ultra-low emission vehicles but so would any other new development anywhere, so that is not an indication of a sustainable location. It is acceptably located for cycling but poorly located for walking and for encouraging public transport use. As a consequence the development would be highly dependent on car travel for day-to-day activities.

29. I conclude therefore that the general acceptance of Kesgrave as a sustainable location by the two main parties is misleading in relation to this specific site. In consequence this proposal would result in a degree of harm to all three elements of sustainable development if permission were granted. It would be contrary to Local Plan policy SP1 (b) and (g) which seek to relate new housing development to employment services, transport and infrastructure and to reduce the overall need to travel and to policy SP2 which seeks to distribute land for new homes in accordance with the Settlement Hierarchy drawn up on the principles of sustainable development.

Effect on countryside

30. As the appellant’s counsel observed in both opening and closing, there are no site specific development control issues raised in the reason for refusal. None relating to the effects on the countryside emerged during the Inquiry. This is a site which has no planning or landscaping designation. It is not marked as countryside out of the ordinary. There is no suggestion that it is a valued landscape. There is no issue on ecology. Although it is agricultural land, it is not the best and most versatile agricultural land.

31. Government policy, set out in NPPF paragraph 17 bullet 8 and in paragraph 111, is that planning should encourage the effective use of land by reusing land that has been previously developed. This is a greenfield site and so its development would not align with that government preference and would transform its character and appearance from an undeveloped to a developed area but otherwise little or no harm to interests of acknowledged importance would ensue from its development.

32. I conclude (as indeed, the appellant accepts) that the development would be contrary to Local Plan Strategic Policy SP20, which in turn applies policy SP29 in that the site lies in the part of the Eastern Ipswich Plan Area which is countryside, where new development will be limited to that which of necessity requires to be located there (or would otherwise accord with special circumstances which do not apply in this case). But any harm, over and above

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2 Policy SP28 and its elaboration DM3 apply to developments within "other villages" within the Eastern Ipswich Plan Area (i.e. those not having physical limits boundaries) and so are not relevant to this proposal, which is for the development of open countryside.

https://www.gov.uk/planning-inspectorate
the intrinsic consequences of developing a greenfield site contrary to the expressed preferences of government and the intangible harm to the concept of a plan-led system, would be minimal.

**Open space provision and network connections**

33. Of its nature, this is an outline proposal whereas these are considerations that must await determination when details of reserved matters are submitted. Suffice it to say that a condition, recommended by Natural England and accepted by both main parties, would require the provision of a quantity of open space sufficient to serve the needs of the development and to provide mitigation for any potential effects on nearby SPA and Ramsar sites. A further condition, recommended by the County Council and accepted by both main parties, would require the provision of a footpath connection across the site on an east-west alignment. Finally, the planning obligations provide for the County’s costs in making public path creation orders to provide network connections into Kesgrave across the bridleway to the north of the site.

34. I conclude that the proposal would have an acceptable effect on the provision of open space and network connections. It would therefore comply with that part of Strategic Policy SP20 which requires the countryside part of the eastern Ipswich Plan Area to secure an improved network of green spaces around the more urban area and to create alternative opportunities for countryside recreation for existing and future residents as a preferred alternative to visiting European nature conservation sites.

**Pressure on services**

35. It is undisputed that schools currently serving the Kesgrave area do not have the capacity to take on the pupils who would derive from this development. Likewise the general practitioners who provide healthcare services are oversubscribed. But, as government Guidance points out, the Community Infrastructure Levy (CIL) is a tool for local authorities to help deliver infrastructure to support the development of an area.

36. Guidance advises that charging authorities should set a CIL rate which does not threaten the ability to develop viably the sites and scale of development identified in the relevant plan and should strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area. So it follows that CIL cannot be expected to pay for every infrastructure need arising from a development; as the Guidance states, it is a tool to help. Moreover, the CIL rate is calculated across an authority. Payments arising from one site which are more than the costs of providing the infrastructure to that site can balance less adequate payments from another site and vice versa.

37. It follows (though Guidance does not explicitly state) that where the infrastructure impacts of a development fall within the terms of an authority’s list of requirements to be met by CIL (which here include educational and health facilities), the appropriate contribution to the provision of those infrastructure requirements arising from that development is deemed to be met. I therefore consider that the proposal would make an adequate contribution to the provision of education and health facilities, notwithstanding

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3 Guidance Paragraph: 094 Reference ID: 25-095-20140612

https://www.gov.uk/planning-inspectorate
the local planning authority’s calculation that the full costs of the necessary provision to serve this site would not be met by the particular CIL contribution arising from this site.

38. In addition to the CIL contributions, specific provision is made within the unilateral undertakings for transport infrastructure improvements (traffic lights at junction of Bell Lane and Foxhall Road, extended speed limits, bus stops on Foxhall Road and a five years’ subsidy for pump-priming improved public transport provision). These will accommodate the pressure on transport infrastructure expected to arise from the development.

39. I therefore conclude that the effects of the proposal on infrastructure services would be acceptable. It would comply with Local Plan policy SP1(d) which seeks to ensure the provision of appropriate infrastructure to support existing and proposed communities. These are all mitigations which answer objections to the scheme; they are not enhancements to weigh in its favour.

Housing Land Supply

40. Any housing development is of benefit as government advice in the NPPF repeatedly makes clear. The provision of 30% of the dwellings proposed in this case as affordable housing accentuates that benefit. The issue in this particular case is whether those benefits would be of even greater significance in the light of the Council’s housing land supply position.

(i) The requirement

41. Paragraph 47 of the NPPF sets out five bullet points advising what local authorities should do to boost significantly the supply of housing. The first bullet point is to ensure that the Local Plan meets the full objectively assessed needs (OAN) for market and affordable housing in the housing market area.

42. It is incontestable that the adopted Local Plan does not and did not do this even at the time of its adoption. The OAN was 11,000 dwellings within the plan period. The Local Plan Core Strategy promises provision of at least 7,900 new homes in the plan period. The Inspector’s Report of January 2017 into the examination of the subsequently adopted Site Allocations document records that the combined total set out in the submitted plans and other development totals 8,620 dwellings. Both development plan documents were found sound and adopted but on the bases that the latter was only implementing the former and that an early review of the former would take place with the publication of an Issues and Options Report by 2015 at the latest. That has not happened and so these provisions are, quite clearly, out of date.4

43. That does not mean they should be disregarded. Planning applications (and appeals) must be determined in accordance with the development plan unless material considerations indicate otherwise. The dated nature of the adopted plans is a material consideration but one which, on its own, does not necessarily indicate that a decision should be taken otherwise than in accordance with the plan.

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4 In paragraph 16 of appeal decision APP/J3530/W/15/3138710 the Secretary of State has come to the same view.

https://www.gov.uk/planning-inspectorate
(ii) The supply

44. The second, third and fourth of the five bullet points of NPPF paragraph 47 advise local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% or 20% to ensure choice and competition, to identify a supply for later years, to illustrate delivery through a housing trajectory and to set out a strategy to maintain delivery of a five-year supply to meet their target.

45. The requirement, or target, is set by the Local Plan. In this case, therefore, the target or requirement is at least 7,900 homes in the plan period, or a rate of at least 465 dwellings per annum, excluding any buffer. The data submitted shows that the Council’s delivery has fallen short of this target in five of the last eight years. Although delivery has picked up and exceeded targets in the last three years, a cumulative shortfall for the period still persists and so it would not be unreasonable to continue to apply a 20% buffer to the target.

46. The parties are unable to come to an agreement on the current quantity of specific deliverable sites which might provide the next five years’ supply. I have not examined their reasons in relation to each individual site because the circumstances of each site are volatile and so any precise figure arrived at would give a spurious impression of accuracy.

47. Rather, I take note of the Council’s confirmation that its calculations include no factor for the vicissitudes of life such as non-take-up of permissions or unexpected delays or difficulties in delivery. I also note that its track record of forecasting supply is consistently 65% accurate. I accept the claim that recent staff appointments and changes in the focus of its activity should have improved that accuracy but, even so, I doubt that its forecasts can be 100% reliable. On the other hand, the appellant’s trajectory seems to treat any difficulty as insurmountable and does not appear to have included any factor to recognise the ability of a developer to make sudden or unexpected progress on a site. Consequently, I regard it as pessimistic. The truth probably lies somewhere between the two but tending towards the appellant’s figure of 3,552 rather than the Council’s 4,349.

48. Even so, on the appellant’s (probably pessimistic) supply figures, and taking on board a 20% buffer (the most pejorative to the Council’s case), the Council is very close to being able to demonstrate a five-year supply at the present moment, including making good its past shortfall. Compensating for the appellant’s inherent pessimism, it is probable that a five-year supply against the requirement of the Local Plan just about exists currently, in so far as the uncertainties of the method allow such a definitive statement.

49. In appeal decision APP/J3530/W/16/3160194 the Secretary of State has made a calculation of a 3.5 year supply using the Local Plan’s OAN as a requirement figure in substitution for the out of date target set in the Local Plan. I have not felt the necessity to do a similar calculation in this case because it is only needed for the purposes of establishing whether relevant policies for the supply of housing should be considered out of date in accordance with NPPF paragraph 49, whereas I have already concluded, in my paragraph 42, that they are out of date in any event. But, as also stated earlier, although the datedness of the adopted plans is a material consideration
it is one which, on its own, does not necessarily indicate that a decision should be taken otherwise than in accordance with the plan.

(iii) New information

50. A new SHMA was published in May 2017. It establishes a new OAN for Suffolk Coastal of 10,111 dwellings but for a different period (2014-36), equating to an annual rate of 460 dwellings per annum, considerably less than the annual rate of the previous OAN (647 dwellings per annum) but similar to the requirement (at least 465 dwellings per annum) set by the Local Plan.

51. Whilst this new information is clearly a material consideration, OAN figures must be handled with care. The previous OAN, even if not tested to destruction, had been through an examination process and is incorporated within a development plan document which has been found sound. But, as noted above, that Core Strategy is dated and its OAN was prepared in accordance with methods which are themselves out of date.

52. The new OAN is claimed to have been prepared in accordance with currently recommended methods but, unlike the previous OAN the new OAN has not yet been examined in any way. The appellant in this appeal has set out comments and criticisms of the calculations in the new OAN. It is not appropriate for me, in the context of a s78 appeal to examine the reliability of the new OAN; I simply note its findings and that they are untested and subject to criticisms.

53. In any event, an OAN is not a housing requirement or target. That is set through a local plan. The requirements may turn out to be higher or lower than the OAN, depending on policy considerations and the duty to cooperate. I note that the new OAN for Suffolk Coastal is identified within the context of a SHMA which covers five local authorities and two housing market areas. I am aware of suggestions that the OAN for at least one of the other authorities which shares a housing market area with Suffolk Coastal could only be met by reassigning requirements to other of the authorities within the same market area through the duty to cooperate. That is one of the options canvassed (Section B, Option 2 for Ipswich Borough Council) in the recently published Issues and Options document for the Suffolk Coastal Local Plan Review. It is not a matter for me to determine.

54. The Issues and Options document was published for consultation on 18 August 2017. It considers the need for further growth in the area and where it should take place, poses questions on a variety of topics and canvasses far more sites than would be actually needed as potential land for development. One of these is site 520, a 61.6 hectare site which includes the appeal site. I note that, whatever option is pursued, at least 27% of growth should be accommodated in the area to the East of Ipswich, an area which may include this site. But, no assessment of its suitability for development or of what may be needed to be done to make it a sustainable location for development is included in the Issues and Options document and so its publication adds no further information to the matters already considered in this decision.

(iv) Summary

55. In summary; this proposal would provide the benefit of 300 new dwellings, 100 of which would be in the form of affordable housing. The Council has fallen behind in delivering its housing requirements and has not yet caught up,
though progress is being made. It has just about got an identified five-year housing supply against its Local Plan targets, including a 20% buffer and has clearly done so against a 5% buffer, though not against a higher target set in a recent appeal decision\(^5\).

56. Although it is possible that the review of its Local Plan may set a higher target through the operation of the duty to cooperate, that has yet to be settled. Consequently, at this moment in time, there does not appear to be any disproportionate benefit resulting from the housing proposed. It would provide the equivalent of about two-thirds of one year’s supply, additional to planned delivery and would provide a very useful cushion against potential delays to that supply. Although outside the defined settlement boundary, it would contribute towards exceeding the Council’s housing target, in accordance with policy. That is the measure of its benefit.

Conclusions

57. As the Statement of Common Ground makes clear, the proposal was tested against twenty-seven Core Strategy policies and found acceptable against most of them. Examination of the Council’s reasons for refusal shows that most of them could be satisfied by conditions or would be satisfied by obligations but there does remain the intrinsic resource cost associated with using a greenfield site and the intangible harm of conflict with the defined settlement boundaries. Moreover, and in any event, the Council’s reasons for refusal did not identify the matter, raised by third parties, of whether the development is in a location which is, or could be made, sustainable.

58. The social and economic benefits of providing housing, albeit without any disproportionate or urgent need, would normally outweigh the limited harm expressed in the Council’s reasons for refusal because the Council’s housing target is a figure to be exceeded, not one to which development should be limited. Other benefits claimed by the appellant are mitigations of harm rather than positive enhancements to be weighed in the development’s favour. Moreover, close consideration of third parties’ points reveals that, contrary to the agreement reached between the Council and the appellant, this site would not be in a sustainable location because it is distant from opportunities to undertake day-to-day activities and the development itself would not remedy that.

59. Important though the provision of housing is, it is also important that patterns of growth are actively managed to make the fullest possible use of public transport, walking and cycling and to focus significant development in locations which are, or can be made, sustainable. There is speculation that the forthcoming review of the Council’s local plan may include this site within an allocation for development. If it does so, it will be examined to ensure that any allocation accords with the government’s principles for sustainable development. This particular proposal does not and so, the appeal is dismissed.

P. W. Clark

Inspector

\(^5\) APP/J3530/W/16/3160194
# APPEARANCES

## FOR THE LOCAL PLANNING AUTHORITY:

Mrs Harriet Townsend, of Counsel  
Instructed by Hilary Slater, Head of Legal Services, Suffolk Coastal District Council

She called:  
Ben Woolnough, BSc(Hons) MSc MRTPI  
Major Projects Advisor, Suffolk Coastal District Council

Christina Howick MA MSc(Econ)  
Partner, Peter Brett Associates

She took part in the round table discussion on Housing Land Supply:

Philip Ridley BSc(Hons) MRTPI  
Head of Planning and Coastal Management SCDC

The following took part in the round table discussion on Housing Land Supply and on conditions:

Neil McManus MRICS ACES  
Development Contributions Manager, Suffolk CC

Luke Mitchell BSc  
Flood & Water Engineer, Suffolk County Council

Luke Barber BSc DipME, DipCE  
Senior Development Management Engineer, SCC

## FOR THE APPELLANT:

Sasha White QC  
Instructed by Tim Johnson, Shoosmiths

She called:  
Charles Collins MSc MRTPI  
Planning Director, Savills

The following took part in the round table discussion on Housing Land Supply:

Christopher May (BA(Hons) MRTPI  
Executive Director, Pegasus Planning Group

Mark Hewett  
Partner, Intelligent Land

Tim Johnson  
Took part in the round table discussion on conditions

## INTERESTED PERSONS:

Rebecca Patten  
Kesgrave Town Councillor

Jane Cody  
Local resident

Sue Hall  
Kesgrave Town Council Public Transport Liaison Officer
Additional DOCUMENTS handed in at Inquiry

0 Claim form and Statement of Facts and Grounds challenging “Bredfield” appeal decision (APP/J3530/W/16/3165412)
1 Ben Woolnough Summary Proof of Evidence
2 “Siege Cross” appeal decision (APP/W0340/W/15/3141449)
3 “Barwood Land” judgment [2017] EWCA Civ 893
4 Suffolk Coastal Community Infrastructure Levy Charging Schedule
5 Extract from national Guidance; CIL rates
6 E-mail 7 August 2017 setting out Suffolk Coastal CIL receipts
7 Technical Note by Christina Howick; Economic Activity Rates
8 Revised table ID2.2; Local facilities in close proximity to the site
9 Ss25 and 26 of Highways Act 1980
10 E-mails concerning delivery of Adastral Park development
11 Appellant’s Housing Land Supply Position Statement 8.8.2017
12 Summary of 5-year HLS scenarios
13 Supply sites trajectory assessment
14 Supplementary note regarding supply forecasting
15 Communications between SCDC and Long Strops landowners
16 Note on the obligations, option agreement and Highways Act
17 Draft Option agreement
18 SCC’s revised conditions
19 SCDC CIL compliance statement
20 Vectos note on pedestrian accessibility
21 “St Modwen” judgment [2016] EWHC 968 (Admin)

Additional DOCUMENTS received after Inquiry sittings

22 E-mail from Tim Johnson of Shoosmiths, attaching note on data behind Council’s Housing Trajectory forecasts and note on s106 agreement
23 E-mail from Ben Woolnough responding to above.
24 Issues and Options for the Suffolk Coastal Local Plan Review
25 Appellant’s comments on the Issues and Options report
26 Signed and dated s106 Agreement and Unilateral Undertaking
27 Jane Cody’s comments on the Issues and Options report
28 Council’s response to appellant’s comments on the Issues and Options report
29 Appellant’s final comments on the Issues and Options report, attaching appeal decision APP/J3530/W/15/3138710
Appendix 2 – Appeal Decision (APP/J3530/W/16/3160194)
Appeal Decision

Inquiry Held on 26 June 2018
Unaccompanied site visit made on 25 June 2018

by J A Murray  LLB (Hons), Dip.Plan Env, DMS, Solicitor
an Inspector appointed by the Secretary of State

Decision date: 20 July 2018

Appeal Ref: APP/J3530/W/16/3160194
Land east of Bell Lane, Kesgrave

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Persimmon Homes Limited and BTP Limited against the decision of Suffolk Coastal District Council.
- The application Ref DC/15/4672/OUT, dated 18 November 2015, was refused by notice dated 15 July 2016.
- The development proposed is described in the application as a “phased development of 300 dwellings, the provision of land for a primary school and associated landscaping and open space.”
- This decision supersedes that issued on 30 October 2017. That decision on the appeal was quashed by order of the High Court.

Summary of Decision: The appeal is dismissed.

Procedural matters

1. I made an unaccompanied site inspection the day before the inquiry opened, when I was in the vicinity from about 16:30 to 17:45. I saw the site from Bell Lane and walked to the Foxhall Road junction. I also followed the Long Strops bridleway (BR49) from Bell Lane to a point beyond the eastern boundary of the appeal site. I walked north from Long Strops to Cedarwood Primary School, past the eastern school boundary. I saw the connections from Hares Close and Ogden Grove to Long Strops and took the path through Fentons Wood from its south-western corner. I walked from Cedarwood School back to the appeal site frontage via Halls Drift, Potters Approach, Ogden Grove and the western section of Long Strops, which took about 10 minutes.

2. I saw a good part of the Grange Farm estate and noted the relationship between the appeal site and local shops, services and facilities. On this basis, all parties were content that an accompanied site visit was not necessary.

Preliminary matters

3. The proposal does not include a primary school, but rather makes land available for use as a school playing field. Accordingly, the parties agreed that it is better described as a phased development of 300 dwellings, the provision of land for use as a primary school playing field and associated landscaping and open space. The application was submitted in outline with all matters reserved except access.
4. Following the consent order quashing the previous appeal decision, the appeal is to be re-determined on the basis that the whole case is considered afresh. The quashed decision is treated as though it had not been made and is incapable of having any legal effect. The parties agree that consideration should be given to all of the original planning issues, not just those described in the consent order, namely the adequacy of the Inspector’s reasoning in relation to housing land supply. I will also take account of any new evidence or material changes in policy or circumstances since the first inquiry.

5. Given the proximity of the site to the Deben Estuary SPA/R SSSI (the Deben Estuary site), there is some concern over the potential for “recreational pressure” on that site from prospective residents of the proposed development. However, at the time of the previous inquiry, the parties, Natural England and the Inspector concluded that, with the mitigation measures proposed, there would be no significant effect on the Deben Estuary Site. It was therefore considered that an “appropriate assessment” was not required by The Conservation of Species and Habitats Regulations 2017 (the Habitats Regs). Since then, the European Court of Justice ruled in People over Wind, Peter Sweetman v Coillte Teorant Case C-3/17 that this approach is wrong; if mitigation measures would be required to avoid significant effects, a full appropriate assessment must be made.

6. The parties agreed that an appropriate assessment would be required, if I were minded to grant permission¹ but, as at the date of the inquiry, I did not have the information necessary to make that assessment, including an up to date consultation response from Natural England. However, as the need for an appropriate assessment would only arise, if I were otherwise minded to grant planning permission, I continued with the inquiry to hear evidence and submissions on all other matters. All parties were content with that approach.

**Main Issues**

7. The main issues are:

(a) whether the proposed development accords with the development plan as a whole;

(b) whether occupiers of the proposed development would have adequate access, particularly pedestrian, cycle and bus access, to shops, services, facilities and employment and whether the development would be successfully integrated with Kesgrave;

(c) whether, leaving aside any impact on the integrity of the Deben Estuary SPA/R SSSI, material considerations indicate that the appeal should be determined otherwise than in accordance with the development plan, having particular regard to whether the Council can demonstrate that it has a 5 year supply of deliverable housing sites against its requirements;

If I were minded to allow the appeal on the basis of the above considerations, I would then have to go on to consider, following an appropriate assessment under the Habitats Regs:

¹ Regulation 63(1) of the Habitats Regs.
(d) whether the proposed development would adversely affect the integrity of the Deben Estuary SPA/R SSSI, having regard to the conservation objectives of that site; and, if it would have an adverse effect:

(e) whether, there being no alternative solutions, the development must be carried out for imperative reasons of overriding public interest.²

Reasons

The development plan

8. As set out in the Statement of Common Ground (SOCG)³, the development plan comprises: the Suffolk Coastal District Local Plan Core Strategy and Development Management Plan Document (CS), adopted July 2013; the Site Allocations Development Plan Document (SADPD), adopted January 2017; and the remnant saved policies from the Suffolk Coastal Local Plan (LP).

9. The CS policies relevant to this outline proposal are:
   - SP1 – Sustainable Development
   - SP1A – Presumption in Favour of Sustainable Development
   - SP2 – Housing Numbers and Distribution
   - SP3 – New Homes
   - SP11 – Accessibility
   - SP12 – Climate Change
   - SP14 – Biodiversity and Geodiversity
   - SP15 – Landscape and Townscape
   - SP16 – Sport and Play
   - SP17 – Green Space
   - SP18 – Infrastructure
   - SP19 – Settlement Policy
   - SP20 – Eastern Ipswich Plan Area
   - SP29 – The Countryside
   - DM2 – Affordable Housing on Residential Sites
   - DM3 – Housing in the Countryside
   - DM20 – Travel Plans
   - DM23 – Residential Amenity
   - DM27 – Biodiversity and Geodiversity
   - DM28 – Flood Risk
   - DM32 – Sport and Play

10. The relevant SADP policies are:
    - SSP1 – New Housing Delivery 2015 – 2027
    - SSP2 – Physical Limits Boundaries
    - SSP38 – Special Landscape Areas
    - SSP39 – Areas to be Protected from Development

11. Saved LP Policy AP212, which concerns the “Ipswich Fringe: Open Character of Areas of Land Between Settlements” is also of relevance.

12. The evidence regarding development plan policies was given in the context of the parties’ agreement that CS Policy SP2 is out of date.⁴ It is important to note the reason for this.

² Regulation 64 of the Habitats Regs.
³ Inquiry document (ID) 1.
⁴ Ibid, paragraph 6.3.
13. Policy SP2 stated that the CS would make provision for at least 7,900 new homes across the district in the period 2010 – 2027, with land being distributed in accordance with the Settlement Hierarchy in SP19. By reference to Table 3.3 in the CS, Policy SP2 stated that 29% of the required new dwellings would be provided in the Eastern Ipswich Plan Area.

14. SP2 did not seek to provide for the full "objectively assessed needs" (OAN) of the district. The context for the CS housing provision had been set by the then revoked East of England Plan but, in 2010, the Council had commissioned Oxford Economics to provide updated forecasts of housing need. Using the East of England Forecasting Model (EEFM), they identified a need for 11,000 new dwellings during the plan period. On the evidence available to him from the Examination in Public (EIP) of the CS conducted in 2012, the Inspector said in his June 2013 report that this figure of 11,000 dwellings should be taken as the OAN between 2010 and 20275. This was despite criticisms from some about assumptions made in the EEFM; the Inspector said it was "the best available estimate of need at (that) point."6

15. The EIP Inspector noted that SP2 would not meet the OAN for 11,000 dwellings. However, he accepted that, if he were to suspend the examination pending the Council’s assessment of options and formulation of proposed changes, the plan would likely be withdrawn. He concluded that having the CS in place at an early stage would support the achievement of sustainable development and bring forward sites. In these circumstances, he concluded that an early review would be preferable to suspension of the EIP.7 On this basis the CS was adopted with SP2 explicitly providing for an early review. This was to commence with the publication of an Issues and Options Report by 2015 at the latest, to identify the OAN and make proposals to meet this. That review was not commenced and therefore the Council now accepts that Policy SP2 is out of date.

16. By virtue of section 38(6) of the Planning and Compulsory Purchase Act 2004 (the PCPA 2004), I must determine this appeal in accordance with the development plan, unless material considerations indicate otherwise. Section 38(6) therefore involves a two-stage process; namely consideration of whether the proposal is in accordance with the plan and then, whether there are relevant material considerations.

17. The appellants contend that SP2 being out of date infects the other policies on which the Council relies, such that they should all carry reduced weight. I shall come back to that but, in closing, Mr White QC said:

"4.16 The fact that these policies are out of date and have reduced weight is relevant to the section 38(6) exercise, in that any conflict with these policies must receive reduced weight within the section 38(6) exercise.

Mr Woolnough said during XX that he did not reduce any weight to conflict with out of date policies within his s.38(6) exercise, which is entirely the wrong approach."
4.17 ...the only real conflict is with SP29 (which is then referred to in DM3 and SSP2), which is a policy which must be given reduced weight and importance.

4.18 When weighted against the other numerous policies which the development complies with, which do receive material weight, the proposal does comply with the Development Plan as a whole.8

18. This last paragraph 4.18 suggests that, when assessing compliance with the development plan as a whole, I should take account of the reduced weight of policies resulting from their being out of date. However, no authority was cited for that proposition and it seems to me that the consequences of policies being out of date need to be factored in during the second stage of the section 38(6) process, not the first. A proposal which conflicts with key development plan policies will not conform to the development plan merely because some or all of those policies are out of date for any reason. However, a finding that some or all of those policies are out of date would be a material consideration, which might indicate that the appeal should not be determined in accordance with the development plan.

19. It is clear however, that in determining whether a proposal is in conformity with the development plan as a whole, some policies are inherently more important than others. In R v Rochdale MBC ex parte Milne [2000] EWHC 650 (Admin)9, Sullivan J, as he then was, emphasised the need to make a judgement “bearing in mind such factors as the importance of the policies which are complied with or infringed and the extent of compliance or breach,” and he acknowledged that there may be “minor policies.” Mr White QC used the example of policies requiring the provision of public art or concerning sport and play as ones which might carry less weight.10 Nevertheless, in determining whether the proposal would be in conformity with the development plan as a whole, I will take the individual policies at face value, without considering whether they are out of date for any reason.

20. The Council contends that the appeal proposal would breach Policies SP20, SP29, DM3 and SSP2.

21. Within the “Major Centres” section of the CS, Policy SP20 relates to the Eastern Ipswich Plan Area (EIPA). In closing, Mr White QC said that SP20 is not breached, because it directs development to a Major Centre, namely the EIPA, within which the site lies.11 With due respect to him, Mr White’s submission on this point went further than the evidence of his planning witness Mr May. He confirmed the thrust of his proof of evidence,12 namely that the proposal would indeed breach Policy SP20, but only in as far as that policy refers to SP29. Indeed, the appellants’ stance on this is confirmed in the SOCG.13

22. Nevertheless, the interpretation of Policy SP20 was the subject of some debate during the inquiry and there was a suggestion of ambiguity within the CS. In pressing the point that the site lies within the EIPA, and therefore within a Major Centre at the top of the Settlement Hierarchy established by SP19,

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8 ID35, paragraph 4.16.
9 Referred to by Mr May at paragraph 5.17 of his proof.
10 ID35, paragraph 4.8.
11 Ibid, paragraph 4.11.
12 At paragraphs 5.11.
13 ID 1, paragraph 7.3.

https://www.gov.uk/planning-inspectorate
Mr White QC drew attention to Map 1 at page 136 of the CS.\textsuperscript{14} However, this shows the “Ipswich Policy Area (inc Westerfield)” which, the glossary tells us, is a “\textit{spatial area reflecting the sub-regional role played by Ipswich as defined in the former RSS}.” Though the EIPA falls within the area coloured orange on Map 1, that map does not specifically delineate the EIPA.

23. The CS glossary defines the EIPA as including “the town of Kesgrave”. However, crucially, SP20 says the EIPA is divided into 3 sections: the area to be covered by the Martlesham, Newbourne & Waldringfield Area Action Plan; the main urban corridor of Kesgrave, Martlesham and Rushmere St Andrew; and the smaller settlements and countryside which surround these core areas.

24. The appeal site is clearly outside the area to be covered by the Martlesham, Newbourne & Waldringfield Area Action Plan, as shown on Map 4 on page 139 of the CS. With regard to the urban corridor of Kesgrave, Martlesham and Rushmere St Andrew, SP20 states that the strategy is:

\begin{quote}
\textit{... for completion of existing long-standing housing allocations and other small scale development opportunities within the defined built up area.} (My emphasis)
\end{quote}

The significance of built up areas in the EIPA is reflected in Table 4.2 on page 63 of the CS. This indicates that, within Major Centres, housing development in the form of estates (where consistent with local character), groups and infill will be allowed “within the defined physical limits.”

25. The glossary states that “physical limits boundaries” will be defined on the Proposals Map, namely a separate Local Development Document. SADPD Policy SSP2 provides that physical limits boundaries have been drawn for all settlements listed as Major Centre, Town, Key and Local Service Centre. Paragraph 2.18 of the SADPD indicates that physical limits boundaries define “the main built area(s)” of a settlement. SSP2 states that, outside physical limits boundaries, new residential development will be strictly controlled in accordance with national planning policy guidance and the strategy for the countryside set out in CS Policy SP29.

26. SADPD Map 40 on page 179 shows the physical limits boundaries of Kesgrave (with parts of Rushmere & Martlesham). Whatever the extent of any perceived ambiguity concerning the EIPA, it is clear that the appeal site lies outside those physical limits boundaries. The SOCG confirms this and records the parties’ agreement that the site is within “the remainder of the area”, namely the remainder of the EIPA, which is countryside.\textsuperscript{15}

27. As the appeal site is not within the defined built up area, this proposal does not accord with the strategy in SP20 for the EIPA, and in particular the urban corridor section of the EIPA. Given that the site lies within what SP20 describes as “the remainder of the area”, Policy SP29 applies. This mirrors SADPD Policy SSP2.

28. The conflict with SP20 does not arise solely because it refers to SP29. SP20 is not just about protecting the countryside from unnecessary development; it embodies a positive strategy for sustainable development within the EIPA, to

\textsuperscript{14} \textit{ID 35, paragraph 4.11.}
\textsuperscript{15} \textit{ID 1, paragraph 6.6.}
actively manage patterns of growth as advised by the National Planning Policy Framework published in March 2012 (the Framework).

29. In his proof\(^{16}\), Mr May referred to the “observation” in SP20 that communities “have the opportunity to settle and mature.” When allowing for the completion of allocations and for small scale development within the defined built up area, SP20 says: “In particular, it is recognised that due to the significant levels of growth which have occurred over the past 10 or so years, communities have the opportunity to settle and mature. Developments which offer the opportunity to support this broad approach will be supported...” This is more than a mere observation; providing the opportunity for communities within the urban corridor to settle and mature is part of the Council’s vision of sustainable development. SP20 only encourages developments which offer the opportunity to support that broad approach.

30. I acknowledge that the appeal site lies only 20m or so to the south of the physical limits boundaries of Kesgrave (with parts of Rushmere & Martlesham). Nevertheless, even within those physical limits boundaries, aside from allocations, SP20 only allows for “small scale development opportunities”. A scheme of 300 dwellings would not be small scale and would not be consistent with the broad approach outlined in SP20. As the site is outside the physical limits boundaries, the conclusion that the proposal conflicts with SP20 applies with greater force; it represents a significant conflict.

31. Turning to CS Policy SP29, this restricts new development in the countryside to that which needs to be located there and accords with other CS policies or the special circumstances outlined in paragraph 55 of the Framework. The appellants acknowledge that the site lies in the countryside, being beyond the relevant physical limits boundaries, and that the proposal would breach that policy.

32. In support of SP29, paragraph 4.98 of the CS notes that the countryside is “an important economic asset” and that “the strategy and approach is very much one which seeks to secure a viable and prosperous rural economy as a key element in maintaining the quality of the built and natural environment of the district.” The fact that the appeal site is only 20m beyond the Kesgrave settlement boundary could be said to diminish the extent of the breach with SP29. However, it is a large site of some 15 ha and is located to the south of a strong boundary formed by the Long Strops bridleway and a mature hedge and fence. The proposal would not be a minor breach of SP29.

33. CS Policy DM3 specifically relates to new housing development in the countryside. It only supports such development if specified criteria are met. In short, these all envisage small developments and those satisfying paragraph 55 of the Framework. Paragraph 5.13 of the supporting text states that this overarching policy “first and foremost stresses that such development will be strictly controlled...”

34. None of the criteria in DM3 is met, but the appellants only accept that this policy is breached to the extent that it is cross referenced in SP29.\(^ {17}\) In his proof, Mr May says that there is “nothing else that is material to the appeal in Policy DM3 that adds to the conflict with Policy SP29.” The policy itself says

\(^{16}\) At paragraph 5.10.
\(^{17}\) ID 1, paragraph 7.3.
that the criteria are applied in "the interests of safeguarding the countryside as set out in Policy SP29 as well as meeting sustainable objectives…" DM3 and SP29 overlap and reinforce each other but, if anything, DM3 is of greater relevance than SP29, as it specifically concerns housing. In any event, a development of 300 dwellings on a 15 ha site in the countryside would amount to a significant breach of DM3, notwithstanding the proximity to the physical limits boundary of Kesgrave.

35. SADPD Policy SSP2 also provides that new residential development outside physical limits boundaries will be strictly controlled in accordance with national policy and the strategy for the countryside in CS Policy SP29. Paragraph 2.17 states that these boundaries have operated as a policy guide to development over many years but "have been updated to ensure they are fit for purpose for the plan period and beyond, and are logical and defendable." The proposal would breach the strict control applied by SSP2.

36. Whilst the appeal scheme would represent a significant breach of Policies SP20, SP29, DM3 and SSP2, many other relevant policies are listed in the SOCG and the Council does not allege any conflict with these. None of the witnesses addressed these other policies one by one. When asked which were the most relevant other policies, Mr May referred to his proof, which drew attention to paragraph 4.07 of the CS. This described SP19, which defines the Settlement Hierarchy as "one of the 3 key policies, the other two being Climate Change (Policy SP12) and Sustainable Development (Policy SP1) around which the remainder of the Core Strategy is built." SP19, SP1 and SP12 are clearly important within the plan, but they embody broad strategic principles and it is necessary to look to other policies to ascertain how those principles should be applied in practice.

37. Whilst SP19 places the EIPA at the top of the Settlement Hierarchy as a Major Centre, SP20 sets tailored strategies for different parts of the EIPA. I have already concluded that the proposal would conflict with SP20 and, to use the words of Sullivan J in R v Rochdale MBC ex parte Milne [2000] EWHC 650 (Admin), it cannot be said that SP19 "pulls in a different direction." Similarly, as indicated in paragraph 3.18 of the CS, SP1 "sets the framework which has guided the development strategy for the district." Policies such as SP20, SP29 and DM3 sit within that overall framework and SP1 does not pull in a different direction. Similarly, in seeking to mitigate the impacts of development on climate change, there is nothing in SP12 which pulls in a different direction to the breached policies; the appeal site and the appeal scheme have no particular features which make SP12 especially relevant or important in this case.

38. Policy SP1A reflects the Framework’s presumption in favour of sustainable development. It begs the question whether the development accords with the development plan, but does not assist is answering it. Policy SP3 was not specifically mentioned in Mr May’s written or oral evidence, or closing submissions for the appellants. However, I recognise that, in seeking to increase the stock and range of housing, Policy SP3 provides some support for the proposal. This is in line with the thrust of the Framework but, despite the importance of this objective, SP3 does not support any amount of housing in any location; provision is to be made "in accordance with the principles of sustainable development and sustainable communities." Policies SP20, SP29, DM3 and SSP2 seek to provide for sustainable development and sustainable
communities and SP3 is less significant in the assessment of compliance with the development plan as a whole.

39. The process of determining whether the appeal scheme would comply with Policies SP14 and DM7 concerning Biodiversity and Geodiversity cannot be separated from the process of an appropriate assessment. For the reasons already given, I leave that question aside.

40. The Council alleges no conflict with the other relevant development plan policies listed in the SOCG, or at least acknowledges that compliance could be achieved through the imposition of conditions and/or through planning obligations. However, the appellants did not identify any way in which those policies pull in the opposite direction to the policies breached. The appellants accepted that some, such as SP16 (Sport and Play) should be given limited weight.

41. Just as the parties did not do so, I will not address each of the remaining relevant policies one by one. However, they generally guide how development should be undertaken, assuming it is acceptable in principle. Even DM2, which concerns the very important issue of affordable housing, simply indicates the proportion of dwellings which should be affordable. The provision of affordable housing is a material consideration in the final planning balance, but DM2 does not indicate that development should be allowed on this site just because it would provide affordable housing; this is not an “exception site” which would benefit from the direct and positive support of DM1.

Conclusion on the development plan

42. In terms of the section 38(6) exercise, the Council contends that SP20, SP29, DM3 and SSP2 are “the most directly relevant policies”\(^\text{18}\). Indeed, the SOCG records agreement that the first 3 are “the key policies for consideration of the appeal.”\(^\text{19}\) I accept that SP20, SP29, DM3 and SSP2 are the dominant policies in this case, as they relate to where development should be, rather than how it should be carried out, and they can be specifically applied to this site and this proposal. Given that the appeal scheme would give rise to significant conflict with those policies, I conclude that it would not accord with the development plan, notwithstanding that numerous less important policies would be complied with, or not breached.

Access to shops, services and facilities – integration with Kesgrave

43. The SOCG notes that the site is 20m from a sustainable settlement, which has a range of services and facilities. Furthermore, with the benefit of a section 106\(^\text{20}\) contribution, Suffolk County Council has agreed to use its best endeavours to create a footpath link to Long Strops on the eastern boundary of the appeal site. This would be through a public right of way creation agreement or order under section 25 or section 26 of the Highways Act 1980. It is intended that this new footpath would also link Long Strops to the existing footpath FP44, which currently terminates in a wooded area, some distance to the east of the appeal site.

\(^\text{18}\) ID 34, paragraph 4.
\(^\text{19}\) ID 1, paragraph 6.6.
\(^\text{20}\) ID 18.
44. Table ID4.2 in the SOCG shows the walking distances and times from the centre of the appeal site to the various facilities, assuming there is no new footpath link. Table ID4.3 shows what those distances and times would be, assuming the proposed new footpath is created.

45. Via a unilateral undertaking\(^{21}\), the appellants would provide funding (£17,000) towards the creation of a further 2 public footpaths in the vicinity of the development. During the round table discussion, Mr Barber from the County Council said that there was a strong argument for the new connection at the eastern boundary of the appeal site. The County Council had not considered that contributions to 2 further connections would meet the tests for a planning obligation. However, Mr Barber said he could see Mr Woolnough’s point in relation to wider connectivity and indicated that, if the County Council recognised a good case, they would seek to make those connections.

46. I shall come back to the detail of footpath connections, but note that a separate SOCG relating to highway matters was signed by the appellants and Suffolk County Council, as the highway authority, on 29 May 2018. Among other things, this confirmed those parties’ agreement that the appeal site is accessible by all modes of transport and is within walking and cycling distances of a range of local facilities and employment opportunities. Having regard to proposed mitigation measures, the highway authority is satisfied that the appeal site is accessible by all modes of transport.

47. As well as the proposed new footpath link, some improvements to the local highway network and the production of a residential Travel Plan, the proposed mitigation measures include a financial contribution to an enhanced bus service. As agreed by the bus operator, First Group, the existing service on route 66 would divert from Bell Lane into the appeal site, around a turning circle and out again via the single vehicular site access point. A bus stop would be created within the site, so that a majority of the dwellings would be within a 400m walking distance of a stop, and an additional bus would be provided to maintain the frequency of the No 66 service.

48. I heard evidence from Sue Hall, as a local resident, but also the volunteer Public Transport Liaison Officer for Kesgrave Town Council\(^{22}\). She expressed concern that running a bus into a cul de sac and back out again is not a good use of time and resources and might not be popular with existing Route 66 passengers. She was supported in this by another local resident, Jane Cody, who also gave evidence. Miss Hall considered that this diversion would add perhaps 20 minutes or more to this route. Whilst acknowledging the offer of funding for an additional bus on this route and extending the service into the site\(^{23}\), she doubted the viability of the route at the end of this subsidy. Miss Hall cited the example of a service that ran into the cul de sac formed by Glanville Place and Heathview, just to the north east of the appeal site. She explained that, when the County Council’s subsidy for this service ended in 2012, it was cut, as the bus company said it was not viable without the subsidy.

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\(^{21}\) ID 19.

\(^{22}\) ID 24.

\(^{23}\) The section 106 Agreement, as varied (ID 18 & 20) provides for £120,000 per year for the bus service, index linked, but to a maximum of £600,000.
49. I value the experience and judgement of local people and accept that Miss Hall is very familiar with local public transport issues. However, for the appellants, Mr Dix explained that, assuming an average speed of 14 mph, the 1.2 km diversion into the site would add some 3 to 3 ½ minutes to the route, which now takes about 45 minutes. There is no compelling evidence that the assumed 14 mph average speed is unrealistically high. Indeed Mr Dix explained that it derives from the study of a wide variety of routes. It takes account of delays at stops and junctions and is agreed by the bus company. Whilst Miss Hall and Mrs Cody had particular concerns about the potential for traffic to back up along Bell Lane, account must be taken of the proposal to introduce traffic signals at the Bell Lane/Foxhall Road junction. Mr Dix confirmed that, on a route as long as Route 66, an extra 3 ½ minutes or so would not deter users.

50. Mr Dix also explained that, whilst historically there has been a problem with bus services being discontinued when a subsidy ends, the development of residential travel plans has encouraged people to use services. This usually ensures the continuity of service provision. In any event, First Group has confirmed its view that the subsidy would enable the service to become established and remain viable after the subsidy period. It says this service would make the site accessible to and from Ipswich Town Centre, the Railway Station, the hospital and employment at Adastral Park with BT and other future employers. The County Council also confirmed its support for this approach in its CIL Compliance Statement submitted in May 2018. In all the circumstances, I am satisfied on the balance of probability that the development would benefit from adequate bus access.

51. In terms of overall connectivity, the Council, namely the district Council, refers to the illustrative plans submitted with the application, including the Illustrative Masterplan 7473/050-Rev A04. This shows 5 pedestrian/cycle connections from the northern site boundary to Long Strops. For ease of reference, Mr Woolnough submitted an annotated copy of that plan, with the connections marked 1 – 5. Where I refer to numbered connections points, the numbers are taken from that plan.

52. The connections shown on the annotated plan include one close to the eastern site boundary and marked (5). This would be especially important to ensure reasonable access from Cedarwood Primary School to the proposed playing field in the north-eastern corner of the appeal site. The Council considers that all 5 connections are important to ensure proper connectivity between the proposed development and Kesgrave and its integration with the existing community. However during the conditions/obligations round table session, Mr Woolnough acknowledged that connection (4) might not be essential, as connection (5) would enable access to the school via a gate near the south-eastern corner of the school site. I agree.

53. Mr Dix referred to DfT Guidance contained in Local Transport Note 1/04. This suggests that the mean average utility journey length is approximately 1km for walking and 4km for cycling, though journeys of up to 3 times those lengths are not uncommon for regular commuters. He also refers to the Institution of

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24 ID 31, proposed condition 11.
25 Mr Dix’ proof appendix 15.
26 ID 32.
Highways and Transportation (IHT) document ‘Providing for Journeys on Foot’ (2000)\textsuperscript{28} which indicates preferred walking distances (in metres) as follows:

<table>
<thead>
<tr>
<th></th>
<th>Commuting/school</th>
<th>Elsewhere</th>
</tr>
</thead>
<tbody>
<tr>
<td>Desirable</td>
<td>500</td>
<td>400</td>
</tr>
<tr>
<td>Acceptable</td>
<td>1000</td>
<td>800</td>
</tr>
<tr>
<td>Preferred maximum</td>
<td>2000</td>
<td>1200</td>
</tr>
</tbody>
</table>

54. Assuming the creation of a new footpath link to Long Strops on the eastern boundary (connection (5)), Mr Dix says that the 2 local primary schools (Cedarwood and Heath Primary Schools) are within the acceptable walking distance of the appeal site and Kesgrave High School is within the preferred maximum distance. Of 22 other local facilities identified, he said that 7 are within the preferred maximum walking distance and 15 are beyond it. However, there is some force in his observation that, if children can be expected to walk 2000m to school, there is no reason why adults should only be expected to walk 1200m elsewhere. On that basis, all of the local facilities would be within the preferred maximum walking distance.

55. Without a new footpath link to Long Strops on the eastern boundary, it is apparent from Table ID4.3 in the SOCG that all but Suffolk Orthodontics and Kesgrave Pharmacy would be beyond even the IHT acceptable commuting/school distances and 2 facilities, including Kesgrave High School, would be beyond the preferred maximum. The creation of a new footpath link cannot be guaranteed. I cannot pre-empt the outcome of an order confirmation process under the Highways Act, assuming agreement cannot be reached with the landowner. However, having regard to the appellants’ solicitors notes\textsuperscript{29}, Mr Barber’s comments during the round table session on conditions and obligations and Mr White QC’s closing submissions, there is a reasonable prospect of such a connection being achieved.

56. Nevertheless, even if access onto Bell Lane and to Long Strops via one link to the east (connection (5)) would enable acceptable walking and cycling distances with just those connections, the development would still seem like an enclave, separated from Kesgrave by a strong 720m long, 20m wide boundary, comprising a fence, hedge and the Long Strops bridleway. This is not what was envisaged in the Design and Access Statement (DAS)\textsuperscript{30} submitted with the application. This noted that Long Strops is well used by pedestrians and cyclists and provides links to the Kesgrave town and the surrounding countryside. The Concept Strategy drawing on page 36 of the DAS actually indicates 5 pedestrian/cycle points to Long Strops, in addition to the proposed new footpath link on the eastern site boundary.

57. I also note Mr Woolnough’s evidence that the Long Strops bridleway was incorporated into the masterplan of the Grange Farm estate extension to Kesgrave. He points out that the majority of the southernmost housing in that development faces onto and “directly accesses this important green

\textsuperscript{28} Ibid, appendix 7.
\textsuperscript{29} ID 11 and 30
\textsuperscript{30} CD 2.13.
infrastructure asset and valuable pedestrian, cycle and recreation route.”

Notwithstanding the proximity to the settlement boundary, I am satisfied that, without suitable links via Long Strops to the Grange Farm estate and Kesgrave, the new development would fail to address the connections between people and places or integration into the natural, built and historic environment. I am not persuaded that one new link at the eastern site boundary would provide an adequate level of connection and such an arrangement would be contrary to advice in paragraph 61 of the Framework.

58. To achieve proper integration with the existing Grange Farm estate, it would make sense for the proposed development to include links to Long Strops in the vicinity of the existing links from that established estate. There is some prospect that such additional connections could be achieved. Accordingly, it would be reasonable and necessary to impose a Grampian style condition to require the reserved matters details of the layout to include connections as shown on the annotated copy of the Illustrative Masterplan e.g. in the vicinity of: the southern extremity of Ogden Close (connection (1)); the path through Fentons Wood which connects with Long Strops at the south-western corner of Fentons Wood (connection (2)); the southern extremity of Hares Close (connection (3)); and the north-eastern corner of the site (connection (5)). The approved connections could be required to be completed for use prior to first occupation of any of the dwellings in the respective phase of the development.

59. In these circumstances, the lack of connectivity achieved by the appellants’ current firm proposals need not result in dismissal of the appeal. I conclude on this issue that, subject to the imposition of an appropriate condition, occupiers of the proposed development would have adequate access, particularly pedestrian, cycle and bus access, to shops, services, facilities and employment and the development would be successfully integrated with Kesgrave.

Other material considerations

Out of date policies

60. When setting out the context for consideration of compliance with the development plan, I noted that the requirement in SP2 to make provision for 7,900 new homes in the period 2010 to 2027 is out of date. This is because, regardless of any other arguments, an early review of the CS did not commence by 2015, as required by SP2 itself. Given that SP2 also provided for the distribution of these new homes in accordance with the Settlement Hierarchy in SP19 there is, on the face of things, some logic in the appellants’ contention that this would have a “seminal effect” on SP19, SP20, DM3 and SSP2. Indeed, Mr Woolnough accepted during cross examination that SP19 should be accorded less weight, as SP2 is out of date, though he did not accept that in relation to SP20, SP29, DM3 or SSP2.

61. Specifically in relation to SSP2, paragraph 2.16 of the SADPD indicates that physical limits boundaries have been re-drafted to implement CS Policies SP19 and SP2. The Inspector who carried out the EIP stressed that the role of the SADPD was to implement the CS and therefore to meet the housing requirement in that plan. She noted that the OAN and housing policies were

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31 Mr Woolnough’s proof, paragraph 7.5.
33 CD 5.19, paragraphs 26 – 29.
not reviewed in accordance with CS Policy SP2. Accordingly, SP2 was already out of date. Nevertheless, she said that the physical limits boundaries had allowed for space within settlements for minor infill development and also incorporated sites of 5 or more houses where the principle of housing had been accepted by the Council. She found that “a consistent approach had been taken to the drawing of the boundaries, taking public consultation responses into account.” Whilst the EIP Inspector noted concerns that sustainable development might potentially be prevented outside those boundaries, she concluded that the physical limits boundaries were “justified, effective and positively prepared.”

62. When cross examined, Mr May said that SP29 was not out of date. Indeed, he acknowledged that, if the development plan and planning permissions are meeting the need for housing, there is no reason to reduce the weight of SP29, although he stressed this did not mean the appeal should be dismissed. By contrast, Mr May said that, as a result of SP2 being out of date, SSP2 carries reduced weight, even if the OAN for housing is still being met. In answer to my questions though, he accepted that “the key thing here is the lack of a 5 year housing land supply.” Expanding on this, he said that, if the OAN is actually much more than the out of date policy requirement in SP2, the distribution policy, which includes provision for 29% of housing growth in the EIPA, may be inappropriate. Nevertheless, whilst not wanting to entirely “let go of” the relevance of the datedness of SP2, Mr May accepted that this factor did not really have practical consequences if the OAN could still be met; it was just a “policy principle.”

63. If sufficient housing can still be provided within the constraints of the key breached policies, SP20, SP29, DM3, and SSP2, there need be no automatic reduction in the weight of these policies, simply because SP2 is out of date and the requirement for 7,900 new homes in the plan period is no longer appropriate. To put it another way, if SP20, SP29, DM3 and SSP2 remain conducive to meeting the district’s OAN for housing, the datedness of SP2 would not of itself indicate that the appeal should be determined otherwise than in accordance with the development plan.

Five year housing land supply

64. Paragraph 47 of the Framework requires the Council to identify a supply of specific deliverable sites to provide for 5 years worth of housing against its requirements. However, notwithstanding paragraph 49, given footnote 9, paragraph 119 and the need for an appropriate assessment under the Habitats Regs, a failure to do this would not engage the so-called ‘tilted balance’ in paragraph 14 of the Framework. The lack of a 5 year housing land supply would be a material consideration, the weight of which would depend on the extent of the shortfall. It would simply be a question of whether this and any other material considerations indicate that the appeal should be determined otherwise than in accordance with the development plan.

65. The appellants contend that the OAN should be taken as 11,000 dwellings over the period 2010 to 2027 (equating to 647 per annum), as accepted in 2013 by the Inspector who conducted the EIP of the CS. This figure was identified by Oxford Economics in 2010 (the 2010 OAN). The Council argues that the appropriate OAN figure is 10,111 dwellings over the period 2014 to 2036.

34 Ibid, paragraphs 53 – 56.
based on the May 2017 Strategic Housing Market Assessment (SHMA), (equating to 460 dwellings per annum). On an annual basis, this is very similar to the policy requirement in SP2, namely 7,900 dwellings, but over the period 2010 to 2027 (equating to 464 per annum).

66. The appellants do not accept that the Council’s housing land supply is as generous as that set out in the June 2018 Housing Land Supply Assessment (HLSA). Nevertheless, they acknowledge that, even using their own supply side figures, the Council will have a 7.42 year supply, if the 2017 SHMA figure of 460 dwellings per annum is used. This takes into account a 20% buffer, the need for which is agreed because of the Council’s acknowledged record of persistent under delivery. Based on the Council’s supply side figures, there will be a 9.3 year supply, if the SHMA figure is used.

67. By contrast, on the basis of the appellants’ supply side figures and the 2010 OAN for 647 dwellings per annum recognised in the CS, the Council would only have a 2.85 year supply. Even using the Council’s supply side figures, it could only demonstrate a 3.57 year supply. Accordingly, as acknowledged by both parties in closing, the supply argument is largely academic. Based on the SHMA, the Council can demonstrate a healthy supply of between 7.42 and 9.3 years. Based on the 2010 OAN figure, a supply of between 2.85 and 3.57 years would represent a significant shortfall.

68. The Planning Practice Guidance (PPG) indicates that where evidence in Local Plans has become outdated and where, as here, emerging plans are not yet capable of carrying sufficient weight, information provided in “the latest full assessment of housing needs” should be considered. However, the weight given to these assessments should take account of the fact that they have not been tested or moderated against relevant constraints. Where there is no robust recent assessment, the PPG says household projections published by the Department of Communities and Local Government should be used though again, the weight attributed to these projections should take account of the fact that they have not been tested.

69. There are some obvious problems with the 2010 OAN figure. Whilst it was accepted in the context of the CS EIP in 2013, the assessment is now 8 years old and indeed nearly half of the period to which it related has already elapsed. Furthermore, as noted at paragraph 3.30 of the CS, that 2010 assessment was based on old data, namely from the 2001 Census. The CS anticipated its early review in the context of “updated objectively assessed housing needs for the period to 2031”, which would have been “re-assessed using information from the 2011 Census.” The 2010 assessment was also made long before publication of the PPG and was not therefore undertaken in accordance with that guidance. Mr May acknowledged during cross examination that, if household projections were used, the Council could show a 5 year housing land supply, but maintained that the 2010 OAN should be used.

70. Ms Howick identified an additional, if less obvious problem, namely that the 2010 OAN relied on EEFM demographic predictions for the district, which she

35 ID 23, paragraphs 2.7 – 2.8.
36 ID 4.
37 ID 23, Table 4.
38 ID 35, paragraph 5.5 and ID 34, paragraph 39.
39 ID 25.
said are flawed because they do not take account of the district’s “exceptionally elderly population profile.” As a result, she says the EEFM job-led housing need figure is “not a credible view of future housing need.” Mr May did not contradict this and, though she also emphasised this point in her oral evidence, Ms Howick was not challenged on it in cross examination.

71. A number of appeal decisions concerning sites in this district have been drawn to my attention. Those appeals determined before the Council’s acceptance that the policy requirement in SP2 for 7,900 dwellings was out of date and/or without reference to the SHMA published in May 2017 are of little assistance.

72. However, a decision issued on 14 June 2017 concerning a site at Woodfield Road, Bredfield did take account of the SHMA. Nevertheless, the Inspector said:

"10. The appellant is sceptical of the OAN figure advanced in the new SHMA, especially the proposition that the OAN going forward would be notably lower than the OAN of 11,000 homes confirmed in the CSDMP. For this reason it is likely the 2017 SHMA will be the subject of detailed scrutiny. Moreover, the Council were unable to explain at the hearing what factors had resulted in the apparent fall in the OAN. The SHMA has not been tested at examination and therefore it cannot be afforded full weight. ...I revert back to the 11,000 OAN figure confirmed in the CSDMP.”

73. The Council sought permission for a statutory review of that decision in the High Court, one of the grounds being that the Inspector rejected the Council’s independent and up to date assessment of OAN in the SHMA. In refusing permission, HH Judge Waksman QC said:

"The Inspector was well-entitled to reject the OAN implicit in the SHMA as not being of sufficient weight for the reasons he gave. He was not given a complete copy and the Planning Officer who represented the Claimant’s case was unfamiliar with it and could not assist as to why the OAN had gone down significantly since 2013 and it had not been independently examined...”

74. The judgement of the court in that case does not necessarily establish that the 2011 OAN figure is to be preferred over the OAN figure from the 2017 SHMA. The court merely ruled that, on the evidence before him, the Inspector in the Bredfield appeal was entitled to take the approach that he did. This does not mean it would not be open to me to take a different approach, especially given that I have been presented with the complete SHMA and more detailed evidence and explanation, in particular from Ms Howick, who directed the SHMA for the Council.

75. Of greatest significance, is the Secretary of State’s decision concerning Candlet Road, Felixstowe, issued on 31 August 2017. However, the inquiry closed in September 2016 and the Inspector’s report was issued January of that year, before publication of the 2017 SHMA. This was then forwarded to the Secretary of State, but given limited weight. The Secretary of State said:

40 CD 12.1, paragraphs 2.4 and 3.31.
42 CD 11.3.
43 ID 26
44 CD 13.3.
"17. Since the inquiry was held, relevant documents have been published. The Suffolk Coastal District Council Housing Land Supply Assessment 1st April 2017 – 31st March 2022 (HLSA) was published in June 2017. It draws on the conclusions of the Ipswich Policy Area Strategic Housing Market Assessment (SHMA), which was published in May 2017. An appeal decision relating to Woodbridge Road, Bredfield (APP/J3530/W/16/3165412) was issued on 14 June 2017. The Council has further provided material relating to discussion of the SHMA at the Bell Lane inquiry (APP/J3530/W/16/3160194).

18. The Secretary of State has considered whether the figure of 11,000 should be amended in the light of this new information. The SHMA identifies an OAN figure of 460dpa, roughly in line with the CS figure. He has taken into account that the HLSA acknowledges that this figure has not been tested, and that this will happen as the Local Plan Reviews progress ... The Secretary of State considers that testing of the SHMA figure is particularly important in this case. He notes that the SHMA highlights several uncertainties: e.g. the causes of UPC cannot be satisfactorily explained, and hence excluding it from future projections could either underestimate or overestimate trend-driven demographic change; migration and household formation are difficult to measure for the past and even more difficult to predict for the future; and there are difficulties in identifying the appropriate housing market uplift. In the light of these uncertainties, the Secretary of State considers it is important that the SHMA is subject to consultation, scrutiny and independent objective testing. He further considers that it is not appropriate or necessary for him to attempt to resolve these uncertainties within this appeal process.

19. He agrees with the Bredfield Inspector's reasoning in paragraph 11 of his decision letter that the fact that the recently adopted DPD was found sound based on a housing requirement of 7,900 homes does not alter the fact that the OAN is identified in the CS as 11,000 homes, and that the Framework states that the housing requirements of an area should be based upon this.

20. For these reasons, he considers that the OAN set out in the SHMA carries limited weight, and considers that a figure of 11,000 for the OAN is appropriate in the current case...

76. The post inquiry representations to the Secretary of State included Ms Howick's proof and rebuttal proof for the first inquiry into this appeal, in which she addressed some criticisms of the SHMA. However, the appellant's agent urged the Secretary of State to reach the same conclusion as the Bredfield Road appeal Inspector concerning the weight to be afforded to the SHMA and suggested that, if he were minded to take a different view, the inquiry should be reopened. The inquiry was not reopened and the Council did not challenge the Secretary of State's decision. Nevertheless, though he acknowledged receiving material relating to discussion of the SHMA at the first Bell Lane inquiry, with respect, the Secretary of State did not specifically address the points raised by Ms Howick in response to criticisms of the SHMA.

77. In his proof for this inquiry, Mr May relied on the Secretary of State’s conclusion on OAN in the Felixstowe appeal and said there had been no change

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45 Unattributable Population Change (se CD 11.6 at appendix C)
46 ID 26.
47 CDs 12.1 and 12.2.
of circumstances which would invalidate that conclusion. To quote from his summary proof, he said the “five-year housing land supply position overall is settled for the purposes of this appeal” by that Felixstowe decision. I also note that, following a hearing, a decision on an appeal concerning a site at Grimston Lane, Trimley St Martin also took the Felixstowe line. The Inspector concluded that due to “the uncertainties implicit in the SHMA, and the lack of testing through plan examination” the OAN figure from the SHMA was not “sufficiently robust.”

78. In chief, Mr May said he did not have particularly strong views about the 3 examples of areas of uncertainty in the SHMA figure, identified in paragraph 18 of Secretary of State’s decision in the Felixstowe appeal. He did not contradict Ms Howick’s evidence that those uncertainties are merely general comments about methodological issues; they are not specific to this SHMA or this district and not material in changing the OAN figure. He did not contradict Ms Howick’s view that the Secretary of State’s reference to identifying the appropriate housing market uplift are not substantiated by the SHMA; it concludes that a 15% market signals uplift is justified and identifies no factors which make setting the uplift problematic. Indeed, the appellants suggest no alternative uplift.

79. Furthermore, when cross examined on the point, Mr May confirmed that he had no criticisms of the SHMA, in terms of what it set out to do, its appropriateness in terms of the PPG, or the housing market area chosen. He agreed that no discounts had been applied to the full OAN and he had no objections to the credentials of Peter Brett Associates, who carried out the SHMA. In these terms, the appellants made no attack on the robustness of the SHMA.

80. In October 2017, Mr May’s firm, Pegasus, did make criticisms of the 2017 SHMA firm in the context of the Local Plan Review. Ms Howick confirmed that these were essentially the same points that had been made by Mr May at the first inquiry in this appeal. They concerned: (a) the use of short term migration trends as the basis for deriving a baseline demographic projection of housing need; (b) the inadequacy of the assessment of past under-delivery of housing in order to establish the extent to which an uplift to the baseline demographic need should be applied; and (c) the use of un-justified and unrealistically high activity rates for the over-65 age group in order to balance jobs growth with the demographic baseline.

81. Ms Howick responded to these points in her rebuttal proof and technical note for the first inquiry. In short, she said that: (a) it would be inappropriate to use the longer base period for in-migration advocated by Pegasus, because that would include a period of exceptionally high in-migration associated with enlargement of the EU - a one-off peak, which is unlikely to be repeated; (b) whilst there had been an undersupply, completions had broadly followed the national trend, so that a 15% uplift is sufficient to respond to that undersupply; and (c) the change in activity rates predicted by EEFM and relied on by Pegasus is almost exactly the same as that predicted by Experian and used in the SHMA. Ms Howick was not challenged on her responses to those points and

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48 CD13.4, paragraph 8.
49 Ms Howick’s proof, paragraphs 2.17 – 2.19.
50 CD 12.9.
51 Ms Howick’s proof, paragraph 2.24.
52 CD 12.2 and 12.3
Mr May did not seek to pursue them at this inquiry. He simply said that Ms Howick did not address the fundamental point that the SHMA had not been tested and said this could only be properly achieved through an EIP.

82. I will return to the question of testing. However, on the evidence before me, I am satisfied with Ms Howick’s responses to the criticisms of the SHMA set out in the October 2017 Pegasus report. I am also satisfied by her responses to the examples of uncertainties stated in paragraph 18 of the Secretary of State’s decision in the Felixstowe appeal.

83. In a supplemental note\textsuperscript{53}, Mr May did also say that the weight of the SHMA OAN is “further undermined” by the publication in May 2018 of the most recent 2016-based Sub-National Population Projections (SNPP) by the Office for National Statistics (ONS) and the revised Mid-year Population Estimates (MYE) issued 22 March 2018. At the time of the SHMA, the 2014-based SNPP were the most up to date projections. Over the period 2014 – 36, the 2016-based population projections show a 52% greater increase in population than is suggested by the 2014-based projections.

84. However, Mr May did not suggest that the 2014-based household projections have been rendered out of date, as it will be necessary to await publication by the ONS of the official household projections in September 2018. These will apply household representative rates to the 2016-based population projections. Mr May was not suggesting that those projections “can be used to derive a proxy figure for household growth and hence the demand for dwellings in Suffolk Coastal for the purposes of this appeal.”\textsuperscript{54}

85. Nevertheless, Mr May did contend that this most up to date evidence casts “further doubt” on the robustness of the SHMA OAN figure and reinforces the Secretary of State’s decision that the 2010 OAN figure is the appropriate one to use. In her supplementary note in response\textsuperscript{55}, Ms Howick acknowledged that the SNPP and MYE are relevant evidence which should be taken into account in any future assessment of housing need, but they would have to be tested and possibly adjusted, before being translated into estimated need, just as the 2014-based figures were when the SHMA was produced. It is perhaps ironic that the appellants rely on recent data to cast doubt on an assessment carried out in 2017, but then urge me to prefer an assessment undertaken back in 2010 and informed by the 2001 Census.

86. There is of course some irony on both sides of the argument because, just as the latest SNPP and MYE have not been tested, the lack of testing of the SHMA is the appellant’s principal objection to it, reflecting the Secretary of State’s decision in the Felixstowe appeal. Ms Howick accepted, both in her proof for the first inquiry in this appeal and when cross examined during my inquiry, that the weight of the SHMA is reduced because it has not yet been tested through an EIP. The PPG\textsuperscript{56} makes that clear in any event. However, the specific criticisms that have been levelled at the SHMA and the uncertainties identified by the Secretary of State in the Felixstowe appeal have not stood up to the scrutiny enabled by my inquiry, albeit that such scrutiny is limited compared to that provided by an EIP, to which many parties could contribute.

\textsuperscript{53} ID 2.
\textsuperscript{54} ID2, paragraph 1.15.
\textsuperscript{55} ID 8.
\textsuperscript{56} ID 25.
87. Although the SHMA has been subject to consultation, the responses had not been analysed at the time of my inquiry and the Council has not formally resolved to ‘adopt’ the SHMA OAN. I cannot assume that the SHMA would emerge unaltered from the rigorous testing process of an EIP. However, there is no evidence before me to indicate that any representations have so far been made which would undermine the SHMA. The lack of testing reduces its weight but, in terms of the PPG, it is still “the latest full assessment of housing needs.”

88. In any event I am satisfied that the SHMA OAN figure carries considerably more weight than the 2010 OAN, which: was based on data from the 2001 Census; was not arrived at in the context of the PPG; and which the CS itself recognised would need to be updated in the course of an early review of the CS, using information from the 2011 Census. The 2010 OAN is old and by no means the latest full assessment of housing needs. Clearly, it is even more out of date than it was when the Felixstowe decision was made. There is also Ms Howick’s unchallenged evidence that the 2010 OAN is derived from technically flawed EEFM predictions.

89. I accept that consistency in decision making is an important objective and I am very conscious that my conclusion is a departure from previous decisions, especially the Secretary of State and Inspector’s decisions in the Felixstowe, Bredfield and Trimley St Martin appeals. I made it clear during the inquiry that I would need good reasons to depart from the approach to OAN taken in those decisions, but I am satisfied that good reasons have ben advanced.

90. I conclude on the evidence that, notwithstanding its reduced weight, the 2017 SHMA is to be preferred to the 2010 OAN in providing, in accordance with the PPG, the latest full assessment of housing needs for the purposes of this appeal. The importance of a recent SHMA, despite a lack of testing, was acknowledged in another appeal to which I have been referred concerning a site at Walton-on-Thames.\(^{57}\) As in that case, my conclusion on OAN is without prejudice to any assessment of OAN or the housing requirement that may be made in the context of the emerging local plan.\(^{58}\)

91. I note that the proposed standard method of assessing local housing need would change matters, but this will only come into effect when the revised Framework is published. Though this is likely to happen very soon, both parties agree that no weight can be given to the anticipated change. That said, the appellants accept that, if the standard methodology were in play, the Council would be able to demonstrate a 5 year housing land supply anyway.\(^{59}\) The expected introduction of the standard method means the SHMA will not be tested at an EIP and the SHMA OAN figure will not make its way into the local plan. However, I do not accept Mr White QC’s submission in closing\(^{60}\) that this factor supports use of the 2010 OAN. Clearly the 2010 OAN will not make it into the local plan either and the SHMA figure still represents the latest full assessment.

92. On the basis of the 2017 SHMA OAN, and even if the appellant’s supply-side evidence were accepted in full, the Council would have a healthy 7.42 year supply of housing land. Accordingly, whilst the Framework seeks to boost

\(^{57}\) CD 12.6, paragraph 340 of the Inspector’s report.

\(^{58}\) Ibid, paragraph 373.

\(^{59}\) Mr May’s proof, paragraph 6.39

\(^{60}\) ID 35, paragraph 5.3.3
significantly the supply of housing, the evidence indicates that the Council is in a position to achieve that. In this context, the fact that the proposal would provide a substantial quantity of new housing carries only limited weight in favour of the appeal, as indicated by Mr Woolnough\textsuperscript{61}. This is in contrast to the Felixstowe appeal where the supply of housing was only 3 – 3.5 years. Though this is not relevant to the basis of the challenge in \textit{St Modwen Developments Ltd V SSCLG, East Riding of Yorkshire Council and Anor} [2017] EWCA Civ 1643, to which Mrs Townsend drew my attention in closing, I note that the Inspector in that case said at paragraph 13.65 of her report: "\textit{Since it has not been shown that there is any pressing need for additional sites to come forward to sustain the local supply of housing, I consider that the appeal proposals would not deliver additional benefits by virtue of their contribution to that supply.}"

93. I turn now to the other material considerations advanced by the appellants.

\textbf{The provision of affordable housing}

94. As well as delivering 200 units of market housing, the proposal would provide 100 affordable units. Mr May said that, whilst the lack of affordable housing was a national problem, this consideration should carry significant weight. Mr Woolnough acknowledged that the provision of this quantity of affordable housing would be a benefit, even with a 5 year supply of housing land. However, he said that, with a healthy supply of 7 years or more and a large number of allocated and consented sites, including the 2,000 dwelling development at Brightwell Lakes (formerly Adastral Park), a considerable amount of affordable housing will come forward without this development. Furthermore, the appeal scheme’s contribution to affordable housing would not be proportionally greater than that of other significant schemes.

95. In her evidence, Ms Howick said that, at 8.95, the 2017 “affordability ratio”\textsuperscript{62} for this district is a little above the average of 7 or 8 for England and Wales, but it is not exceptionally high. I note by comparison that the ratios for Blaenau Gwent, Chelmsford and Kensington and Chelsea are 3.35, 11.38 and 40.69 respectively. In all the circumstances, I attach moderate weight to the contribution this scheme would make to the provision of affordable housing.

\textbf{The economic benefits}

96. As detailed in the SOCG, the building of this development would provide a significant number of jobs during the construction phase and it would support local business, increasing local spend, once the new dwellings are occupied. I accept the evidence of both Mr May and Mr Woolnough that this benefit carries moderate weight.

\textbf{The social benefits}

97. Similarly, I see no reason to depart from the view of Mr May and Mr Woolnough that the development would bring social benefits associated with the provision of a wide range of types and tenures of housing and that this factor should be given moderate weight.

\textsuperscript{61} Mr Woolnough’s proof, paragraphs 8.29 – 8.30.

\textsuperscript{62} ID 17.
Footpath creation

98. Though not highlighted in closing, Mr May’s proof referred to the proposed link between FP44 and Long Strops, as a component of the “social benefits.” This would be achieved through a section 106 contribution and the imposition of a Grampian style condition. It would improve access to the countryside and I attach limited weight to this additional, specific benefit.

Provision of the school land

99. This development would generate a need for increased capacity at Cedarwood Primary School. The provision of land for a playing field would enable the school to expand on its existing site just to the north. This is largely mitigation, but Mr May said that a little more land would be provided than is actually needed. To the extent that this represents a benefit, I attach very little weight to it.

Development in a highly sustainable location

100. The appeal site is in close proximity to Kesgrave Town and its facilities and services, and it would have access to public transport. However, its development would not accord with the development plan strategy and, given the healthy supply of deliverable housing land, the sustainability of the location carries limited weight in favour of the development.

Wider improvements to highway safety

101. The provision of traffic lights at the junction of Foxhall Road and Bell Lane would mitigate the impact of traffic generated by this development. However, Mr Woolnough acknowledged under cross examination that these improvements would have some wider benefits identified in the Transport Assessment\(^{63}\). He agreed with Mr May that this consideration carries moderate weight and I see no reason to differ.

Biodiversity gains

102. As agreed in the SOCG, enhanced planting and biodiversity measures across the site would result in a net gain, when compared with a cropped agricultural field. Mr May and Mr Woolnough agreed that this factor also attracts moderate weight and again, there is no reason for me to take a different view.

Other matters

103. In his written closing submissions, Mr White QC referred to the costs decision following the first inquiry in this appeal\(^{64}\), which was not challenged by the Council. The costs decision said there was “little or no substance to” the Council’s refusal, but this was by reference back to the substantive decision, which has been quashed. When supplementing his closing submissions orally, Mr White QC confirmed that he did not in fact ask me to place any reliance on the terms of the costs decision. I have not done so.

Planning balance and conclusion

\(^{63}\) CD 2.19.  
\(^{64}\) ID 5.
104. I have found that, subject to the imposition of an appropriate condition, occupiers of the development would have adequate access to shops, services and facilities and the development would be successfully integrated with Kesgrave. However, the appeal proposal does not accord with the development plan, as it would give rise to serious conflict with the key policies for consideration of the appeal, namely CS Policies SP20, SP29, DM3 and SADPD Policy SSP2. Having found that the Council has a healthy supply of housing land, the weight of the breached key policies is not reduced, merely because SP2 is out of date on its own terms and it has not been suggested that any of the key policies conflict with the Framework.

105. Mr Woolnough suggested that the cumulative weight of the other considerations in favour of the appeal is only moderate. My analysis of the other considerations advanced reveals 5 of moderate weight, 3 of limited weight and 1 of very little weight. Taken together, these must be given significant weight in favour of the proposal and, in this regard, I accept the submission of Mr White QC in closing.\(^{65}\)

106. Nevertheless, paragraphs 12 and 150 of the Framework support the plan-led system enshrined in section 38(6) of the PCPA 2004 and make it clear that Local Plans are the key to delivering sustainable development. This principle has been reinforced by the courts and I note Mrs Townsend’s reference in closing\(^{66}\) to paragraph 40 of Sales LJ’s judgement in \textit{Gladman v Daventry DC} [2016] EWCA Civ 1146. Notwithstanding their significant cumulative weight, I conclude that the other material considerations identified are insufficient to indicate that the appeal should be determined otherwise than in accordance with the development plan. I am therefore satisfied that the appeal should be dismissed, whether or not the development would adversely affect the integrity of the Deben Estuary Site. It is not therefore necessary for me to undertake an appropriate assessment in accordance with the Habitats Regs.

**Decision**

**Appeal Ref: APP/J3530/W/16/3160194**

107. The appeal is dismissed.

\textit{J A Murray}

INSPECTOR

\(^{65}\) ID 35, paragraph 6.10.  
\(^{66}\) ID 34, paragraph 12.
APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mrs Harriet Townsend of counsel, instructed by the Solicitor to Suffolk Coastal District Council

She called

Cristina Howick MA MSc Partner, Peter Brett Associates LLP

Ben Woolnough BSc(Hons) MSc MRTPi Major Projects Advisor, Suffolk Coastal District Council

Luke Barber BSc DipME DipCE, Senior Development Management Engineer, Suffolk County Council, also took part in the round table discussion of conditions and planning obligations.

FOR THE APPELLANT:

Sasha White QC and Anjoli White of counsel, instructed by Tim Johnson of Shoosmiths LLP

Mr White called

Ian Dix BSc(Hons) MSc Director, Vectors transport planning specialists
MCIT MCIHT

Christopher May Executive Director, Pegasus Planning Group
BA(Hons) MRTPi

Mark Hewett, Partner, Intelligent Land also took part in the round table discussion of housing land supply.

Tim Johnson of Shoosmiths LLP also took part in the round table discussion of conditions and planning obligations.

INTERESTED PERSONS:

Avtar Athwall, local resident and Member of Kesgrave Town Council

Sue Hall, local resident and volunteer Public Transport Liaison Officer for Kesgrave Town Council

Jane Cody, local resident
DOCUMENTS SUBMITTED DURING THE INQUIRY

1. Statement of Common Ground dated 25 June 2018
2. Christopher May’s Supplementary Note re Objectively Assessed Housing Need
3. Inspector’s Pre Inquiry Note
4. Council’s Housing Land Supply Assessment for 1 April 2018 – 31 March 2023, published June 2018
5. Costs decision of P W Clarke dated 16 October 2017 following the previous inquiry in this appeal
6. Erratum to Ben Woolnough’s proof of evidence
7. Summary of Ben Woolnough’s proof of evidence
8. Cristina Howick’s Supplementary Note on Housing Need
9. Primary school roll forecasts summer term 2018
10. Mrs Townsend’s submissions concerning previous appeal decisions
12. Opening submissions by Sasha White QC and Anjoli Foster for the appellants
13. Opening submissions by Harriet Townsend for the Council
15. Council’s preferred version of table 4 in Inquiry Document 14 (ultimately superseded by Inquiry Document 23)
16. Copy of Core Document 12.4 (Planning for the right homes in the right places: consultation proposals: housing need consultation data table)
17. Copy of Core Document 12.5 (Ratio of median house price to medium gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 – 2017)
18. Section 106 Agreement dated 23 August 2017
19. Unilateral Undertaking dated 23 August 2017
20. Deed of variation dated 26 June 2018 (varying section 106 Agreement dated 23 August 2017)
21. Statement of Avtar Athwall, Kesgrave Town Councillor and local resident
22. Supplemental Note of Mark Hewett (submitted for the purposes of the housing land supply round table session)
23. Agreed Supplemental Statement of Common Ground concerning Housing Land Supply (to replace Inquiry Documents 14 and 15)
24. Statement of Miss Sue Hall, local resident and volunteer Public Transport Liaison Officer for Kesgrave Town Council
25. Extract from Planning Practice Guidance (Ref ID: 3-030-20140306) concerning the starting point for the 5-year housing supply
26. Post Inquiry representations to the Secretary of State re Candlet Road Felixstowe Ref APP/J3530/W/15/3138710 and the Order of HH Judge Waksman QC in Suffolk Coastal DC v SSCLG and David Wood and Associates CO3486/2017
27. Number not used
28. Mr Ian Dix’s response to the evidence of Sue Hall
29. Ben Woolnough’s email to the Planning Inspectorate dated 9 March 2017
30. Note prepared by Tim Johnson solicitor concerning the section 106 planning obligations, school land option and sections 25 and 26 of the Highways Act 1980

https://www.gov.uk/planning-inspectorate 25
31 Revised schedule of suggested conditions
32 Copy of the Illustrative Master Plan No. 7473/050/Rev A04 annotated to show the Bell Lane footway access and 5 possible access from the site to the Long Strops bridleway
33 Option Agreement dated 23 August 2017 concerning land for use as a school playing field
34 Closing submissions by Harriet Townsend for the Council
35 Closing submissions by Sasha White QC and Anjoli Foster for the appellants
Costs Decision
Inquiry Held on 8, 9 and 10 August 2017
Site visit made on 7 August 2017

by P W Clark MA MRTPI MCMI
an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 16 October 2017

Costs application in relation to Appeal Ref: APP/J3530/W/16/3160194
Land East of Bell Lane, Kesgrave

- The application is made under the Town and Country Planning Act 1990, sections 78, 320 and Schedule 6, and the Local Government Act 1972, section 250(5).
- The application is made by Persimmon Homes Limited and BPT Limited for a full award of costs against Suffolk Coastal District Council.
- The inquiry was in connection with an appeal against the refusal of planning permission for 300 dwellings, provision of land for a primary school and associated landscaping and open space.

Decision
1. The application for an award of costs is allowed in part in the terms set out below.

The submissions for Persimmon Homes Limited and BPT Limited
2. These are made in writing and so are not summarised here.

The response by Suffolk Coastal District Council
3. This is made in writing and so is not summarised here.

Reasons
4. The Planning Practice Guidance advises that costs may be awarded against a party who has behaved unreasonably and thereby caused the party applying for costs to incur unnecessary or wasted expense in the appeal process.

5. The Council’s main effort in defending its decision was concentrated into successfully justifying its contention that there were no disproportionate benefits arising from the development as a result of the Council’s housing land supply position. But, it should not have been necessary for the appellants to argue that point in the first place because, as my substantive decision on the appeal itself confirms, there is little or no substance in the Council’s reasons for refusal. Such substance as there was would normally be outweighed by the benefits of the development proposed even without any disproportionate or urgent housing need.

6. To that extent therefore, I agree that the Council’s behaviour was unreasonable. Unnecessary or wasted costs were incurred in making the case
for an overriding housing benefit and in challenging the Council’s reasons for refusal.

7. However, once an appeal is made, a proposal is considered *ab initio*.\(^1\) During the consideration of the objections made by third parties it became apparent that the proposal was not in a sustainable location and that the harm this would cause justified dismissal of the appeal. In such circumstances, a full award of the costs of the appeal is not appropriate. A partial award is made, limited to the costs incurred in making the case for an overriding housing benefit and in challenging the Council’s reasons for refusal.

8. I therefore find that unreasonable behaviour resulting in unnecessary or wasted expense, as described in the Planning Practice Guidance, has been demonstrated and that a partial award of costs is justified.

**Costs Order**

9. In exercise of the powers under section 250(5) of the Local Government Act 1972 and Schedule 6 of the Town and Country Planning Act 1990 as amended, and all other enabling powers in that behalf, IT IS HEREBY ORDERED that Suffolk Coastal District Council shall pay to Persimmon Homes Limited and BPT Limited, the costs of the appeal proceedings described in the heading of this decision limited to those costs incurred in making the case for an overriding housing benefit and in challenging the Council’s reasons for refusal; such costs to be assessed in the Senior Courts Costs Office if not agreed.

10. The applicants are now invited to submit to Suffolk Coastal District Council, to whom a copy of this decision has been sent, details of those costs with a view to reaching agreement as to the amount.

*P. W. Clark*

Inspector

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\(^1\) This Latin phrase means afresh, from the beginning.